



PUBLIC DISCLOSURE

July 29, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Cadence Bank, National Association
Charter Number: 3656

Buckhead Tower at Lennox Square
3399 Peachtree Road, NE, Suite 1900
Atlanta, GA 30326

Office of the Comptroller of the Currency

Assistant Deputy Comptroller – Midsize Bank Supervision
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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with the safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**

The following table indicates the performance level of Cadence Bank, National Association (Cadence) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Cadence Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	x	x	
Low Satisfactory			x
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based primarily on overall good Lending Test performance in Alabama and Texas. Borrower and geographical distributions of loans in 2017 through 2018 were generally stronger than performance in 2015 through 2016. Introduction of innovative and flexible lending products in 2017 improved lending in LMI geographies, and to individuals of different income levels and businesses of different sizes.
- The Investment Test rating is based on overall good performance throughout the rating areas. Cadence's CD investment volume generally represented a significant level of qualified CD investments, when compared to allocated tier 1 capital in the respective full-scope AAs. Cadence's CD investments focused on affordable housing and economic development needs in the full-scope AAs. Investments were generally not innovative or complex.
- The Service Test rating is based on overall branch distribution throughout the rating areas. Branches are reasonably accessible to geographies and individuals of different income levels in its AAs. Cadence does not have branches in low-income geographies. CD services are overall adequate.

Lending in Assessment Area

An adequate percentage of loans are in the bank's AAs.

Cadence originated and purchased 79.6 percent of its total home mortgage loans inside its AAs and 80 percent of all loans during the evaluation period. This analysis is performed at the bank level rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. We considered Cadence performance lending inside its AAs in the geographical distribution of loans in the Lending Test.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	7,698	79.6%	1,969	20.4%	9,667	2,003,411	76.9%	600,504	23.1%	2,603,915
Small Business	3,396	80.7%	813	19.3%	4,209	623,852	88.5%	81,127	11.5%	704,979
Small Farm	74	82.2%	16	17.8%	90	6,885	90.1%	760	9.9%	7,645
Total	11,168	80.0%	2,798	20.0%	13,966	2,634,148	79.4%	682,391	20.6%	3,316,539

Description of Institution

Cadence is a multistate bank headquartered in Atlanta, Georgia with total assets of \$12.7 billion as of December 31, 2018. Cadence is a subsidiary of Cadence Bancorporation (CBC), a \$12.7 billion bank holding company located in Houston, Texas. CBC became the top-tier holding company after the dissolution of the former top-tier holding company, Cadence Bancorp, LLC (CB) in September 2018. In 2011 through 2012, Cadence acquired three financial institutions—a failed bank, a troubled bank, and a niche-focused bank in energy services and small commercial real estate. The new amalgamated bank created significant constraints for it to compete across its AAs, similar to newly chartered banks, that continued during the early part of the evaluation timeframe. As a result, Cadence executed an Operating Agreement with the OCC with the intent of improving asset quality, enhancing earnings, and maintaining adequate capital levels. The Operating Agreement was terminated by the OCC on June 9, 2016. Thereafter, Cadence began rebuilding its CRA program with the intent of broadening its AA community lending, including creation of several flexible and innovative loan products, initiating targeted marketing campaigns, and hiring additional staff. There are no affiliated financial institutions and there were no mergers or acquisitions during the evaluation period.

As of December 31, 2018, Cadence broadly defines its markets as the state of Texas and the southeast United States with active banking operations in five primary states: Alabama, Florida, Mississippi, Tennessee, and Texas. As a result, there are five rated states, with 20 assessment areas located in these states. Cadence has 66 full-service branch offices and 59 ATMs, 22 of which are deposit-taking ATMs.

As of December 31, 2018, the geographic focus varies by line of business, with an emphasis on growth in Texas and the southeast United States. The Specialized Industries business line is national in scope, while the Business Services, Mortgage, Retail, and Wealth Services lines of business primarily focus on clients within Cadence's geographic footprint. Cadence focuses on providing banking services to retail consumers, small and middle market businesses, governmental, and commercial clients. Cadence offers a full range of loan and deposit products to businesses and individuals, including financial management, investment and trust services, treasury management, international, retail banking, and mortgage products.

The preceding Cadence CRA performance was evaluated on July 27, 2015, at which time an overall "Satisfactory" rating was assigned.

As of December 31, 2018, net loans totaled \$10.0 billion, representing 78.8 percent of total assets. Commercial and industrial loans made up 52.6 percent of the total loan portfolio. Approximately 41.2

percent of the loan portfolio was comprised of real estate loans, of which commercial real estate and one to four family residential properties (29.5 percent and 58.3 percent, respectively) represented the predominant portion of the real estate loan portfolio. Non-residential consumer loans comprised less than one percent of the total loan portfolio.

Community Credit Needs Assessment

Management engaged a third party to perform a community credit needs assessment for five of its primary AAs. Community stakeholders and bank staff were surveyed in the AAs, along with analysis of demographic data, identification of community credit needs compared to current offerings, and an evaluation of the CRA strategy relative to the findings of the community credit needs. The primary credit need voiced by respondents across the AAs involved the lack of affordable housing, and the need for mortgage lending that contains flexible underwriting standards. The in-house affordable home mortgage product is responsive to addressing an identified community credit need.

The community credit needs assessment identified a need for small business lending and access to credit for both minority business owners and those operating in LMI areas. In addition, the assessment focused on community development lending and services. For community development lending, economic development was highlighted as a specific need in the AAs. For CD services, the assessment concluded the importance of visibility in all segments of the community through branch placement and community outreach performed by bank personnel.

Innovative and Flexible Loan Programs

Cadence offers flexible home mortgage loan programs that are affordable to LMI borrowers. In addition, Cadence offers a small business loan product targeted to LMI areas. Loans originated under these programs are included in the home mortgage loans or small business loans (also referred to in this document as “Small Loans to Businesses”) and are analyzed under other portions of the Lending Test.

- Cadence Affordable Home Loan Program (CAHLP) – This is an in-house portfolio fixed-rate loan product with terms available for both 15- and 30-years. Depending on borrower qualifications, LTVs of up to 100 percent are available with no private mortgage insurance requirement. There is no loan origination fee. The maximum loan amount is \$484,350 (in 2019; \$453,100 in 2018). The property must be owner-occupied and located in an LMI census tract in a Cadence AA, or the borrower must be LMI based on the median income of an AA. This product is designed for home purchase and refinance but is also available for the purchase and repairs of a new home through a home improvement loan feature. The product was created, and marketing began in late 2017. Management began tracking the origination volume in March 2018. Cadence originated 545 of these loans totaling \$95.9 million.
- Cadence Small Business Quick Decision Loan product – This is an in-house portfolio small business loan product designed for businesses located in LMI areas of the AA and with gross annual revenues less than \$1 million. The loan product provides funding up to \$25,000, with low documentation requirements and quick turnaround time for a loan decision. The loan is available as a 36-month term loan, or line-of-credit and can be secured or unsecured subject to underwriting standards. The product was created, and marketing began in late 2017. Management began tracking the origination volume in March 2018. From March through December 2018, 902 loans totaling \$76.4 million were originated.
- Additional home loan products – Cadence also offers and makes various governmental home loan products with flexible underwriting compared to conventional loans and/or lower costs including

those provided through the Federal Housing Administration, Federal National Mortgage Association, United States Department of Agriculture Guaranteed Rural Housing Program, and the Veterans Affairs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The review period for this evaluation is January 1, 2015 through December 31, 2018. All Lending, Investment, Service Test, and CD activity was reviewed during this time frame. Primary loan products, for the purpose of this review, are products which the bank originated at least 20 loans within the AA during one or more of the analysis periods within the overall evaluation period. For this evaluation, multifamily loans are not a primary loan product and were not evaluated separately. Multifamily loans meeting the CD definition were considered as part of the evaluation of CD lending.

In our evaluation under the Lending Test of geographic distribution and borrower income criteria, we performed separate analysis of 2015 through 2016 and 2017 through 2018. This was due to changes in the 2010 U.S. Census and 2015 U.S. Census American Community Survey. In our evaluation of the Lending Test, we reviewed home mortgage loans as an aggregate product that includes home purchase, home improvement, and refinance loans combined.

Selection of Areas for Full-Scope Reviews

In each state where Cadence has an office, one or more AAs within that state were selected for a full-scope review. Refer to the “Scope” section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The overall rating is a blend of the state ratings.

The state ratings are based on performance in all AAs within the state. Refer to the “Scope” section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings. We placed the most emphasis on those AAs receiving full-scope reviews.

Our ratings gave the most weight to the states of Texas and Alabama. Combined these two rating areas totaled 74.6 percent of all loan originations (Texas 43.1 percent, Alabama 31.5 percent). Additionally, deposits in Texas and Alabama accounted for 76.2 percent of total deposits (Texas 44.1 percent and Alabama 32.1 percent).

Within the state of Alabama’s full-scope AAs, we placed the most weight on the Birmingham MSA. We placed the most weight on performance in the Birmingham MSA due to the fact that the Birmingham MSA has the highest percentage of loans and deposits of all AAs within Alabama. Within the state of Florida’s full-scope AAs, we placed the most weight on performance in the Tampa MSA. We placed the most weight on the Tampa MSA due to the fact it had the majority of statewide loan volume, deposits, and branches.

Since home mortgage lending is a primary product, we placed greater weight on home mortgage performance, as compared to small business lending performance. The majority of CRA reportable loans are home mortgage loans, both in number of loan originations and loan volume. Home mortgage loans total 69.4 percent of all CRA reportable loan originations and 76.3 percent of the loan volume by dollar amount, throughout the evaluation period.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Alabama

CRA rating for the state of Alabama:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Good overall geographical and borrower distribution of home mortgage loans and small loans to businesses. Excellent performance in 2017 through 2018 in geographic and borrower distribution of home mortgage loans in the Birmingham MSA is offset by weaker performance in 2015 through 2016.
- Cadence made an adequate level of CD loans in the state of Alabama. Cadence made extensive use of innovative and flexible home mortgage lending products in 2017 through 2018.
- Cadence made a significant level of qualified CD investments. Investments were responsive to identified community needs.
- The branch distribution is accessible to geographies and individuals of different income levels in the state of Alabama.

Description of Institution's Operations in Alabama

As of December 31, 2018, Cadence had seven AAs within the state of Alabama. These AAs include the Birmingham-Hoover MSA (Birmingham MSA) comprised of Blount, Jefferson, and Shelby Counties; the Decatur MSA comprised of Morgan County; the Gadsden MSA comprised of Etowah County; the Huntsville MSA comprised of Madison County; the Tuscaloosa MSA comprised of Tuscaloosa County; the Montgomery MSA comprised of Montgomery County; and five non-metropolitan areas geographically dispersed across the state combined as the AL Non-MSA: Marshall County; Talladega County; Perry County; Monroe County; and Covington County.

Cadence offers a full range of loan and deposit products and services through 25 full service branches within Alabama. The branches represent 37.9 percent of the total branch network. Cadence has 24 ATMs within the state, four of which are deposit-taking ATMs. As of June 30, 2018, Cadence held \$3.1 billion in statewide deposits and ranked seventh in the state, representing a 3.0 percent market share. During the evaluation period, 32.1 percent of deposits and 31.5 percent of loans were from Alabama. The Birmingham MSA is the most significant AA in the state, accounting for 63.6 percent of total deposits and 41.0 percent of loans in Alabama.

Birmingham MSA

As of December 31, 2018, the Birmingham MSA was Cadence headquarters. Strong competition exists for financial services within the Birmingham MSA. According to the June 30, 2018, FDIC Deposit Market Share Report, Cadence ranked fifth of 40 depository financial institutions in the AA, with a 5.5 percent market share and \$1.9 billion in deposits. Competition includes large regional banks and large nationwide institutions. The top four competitors control 71.6 percent of the deposit market share within this AA.

The Birmingham MSA is the bank's largest lending market in the state for products considered in this evaluation, with 1,441 total loans or 41.0 percent of total loans in the state.

To help identify needs and opportunities in the Birmingham MSA, the OCC utilized two regulatory agency contacts with a small business technical assistant provider/lender and an affordable housing provider. The community contacts indicated that there are numerous opportunities for more government and state guaranteed small business loans and the need to create products geared to the unbanked. Such products include small-dollar programs to better compete with payday lenders and smaller dollar mortgage loans. The contacts reported they had good relationships with area financial institutions. According to the U.S. Bureau of Labor Statistics, as of December 31, 2018, the unemployment rate in the Birmingham-Hoover, AL MSA was 3.2 percent, which was lower than the national average of 3.9 percent.

Huntsville MSA

Strong competition exists within the Huntsville MSA. According to the June 30, 2018, FDIC Deposit Market Share Report, Cadence ranked eighth of 28 depository financial institutions in the AA with a 5.2 percent market share and \$374 million in deposits. Competition includes large regional banks along with several institutions with a nationwide presence. The top five competitors control 60.2 percent of the deposit market share within this AA.

To help identify needs and opportunities in the Huntsville MSA, the OCC utilized a regulatory agency contact with an organization that provides community resources, such as financial training and small business development to the county's citizens. The community contact indicated that primary needs are small business loans and training for small business owners. The contact reported that there is enough involvement with the banks in the area. According to the U.S. Bureau of Labor Statistics, as of December 31, 2018, the unemployment rate in the Huntsville, AL MSA was 3.1 percent, which was lower than the national average of 3.9 percent.

Tuscaloosa MSA

The banking industry is highly competitive within the Tuscaloosa MSA. According to the June 30, 2018, FDIC Deposit Market Share Report, Cadence ranked fifth of 24 depository financial institutions in the AA with a 7.6 percent market share and \$264 million in deposits. Competition includes large regional banks along with several institutions with a nationwide presence. The top four competitors control 59.4 percent of the deposit market share within this AA.

To help identify needs and opportunities in the Tuscaloosa MSA, the OCC utilized a regulatory agency contact with an organization that works with rural and urban communities throughout the state to provide technical assistance and linkages to economic development resources. The community contact indicated that primary needs are small business loans and mortgage loans, including assistance for first time homebuyers and affordable home improvement loans. According to the U.S. Bureau of Labor Statistics, as of December 31, 2018, the unemployment rate in the Tuscaloosa, AL MSA was 3.2 percent, which was lower than the national average of 3.9 percent.

Please refer to the Demographic Information for the state of Alabama in Table A below for detailed demographics and other performance context information for AAs that received full-scope reviews.

Birmingham MSA**Table A – Demographic Information of the Assessment Area****Assessment Area: Birmingham AL MSA 2017-2018**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	220	14.1	24.5	28.2	32.3	0.9
Population by Geography	920,266	10.3	21.0	29.9	38.2	0.5
Housing Units by Geography	410,465	11.9	22.9	29.3	35.4	0.4
Owner-Occupied Units by Geography	240,905	6.0	18.4	31.8	43.8	0.0
Occupied Rental Units by Geography	116,374	20.0	27.8	25.9	25.3	1.0
Vacant Units by Geography	53,186	21.3	32.4	25.9	19.9	0.5
Businesses by Geography	58,009	8.1	18.3	28.5	43.7	1.4
Farms by Geography	1,282	3.9	16.1	29.0	50.6	0.4
Family Distribution by Income Level	236,171	23.2	15.3	18.1	43.4	0.0
Household Distribution by Income Level	357,279	25.1	15.2	16.0	43.7	0.0
Median Family Income MSA - 13820 Birmingham-Hoover, AL MSA		\$62,204	Median Housing Value			\$169,308
			Median Gross Rent			\$820
			Families Below Poverty Level			12.7%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

() The NA category consists of geographies that have not been assigned an income classification.*

Table A – Demographic Information of the Assessment Area**Assessment Area: Birmingham AL MSA 2015 - 2016**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	220	11.4	22.3	33.6	32.3	0.5
Population by Geography	910,873	8.5	17.8	35.4	38.2	0.0
Housing Units by Geography	402,425	9.9	20.2	35.1	34.8	0.0
Owner-Occupied Units by Geography	248,678	5.3	15.0	37.3	42.4	0.0
Occupied Rental Units by Geography	104,127	17.2	28.0	31.4	23.4	0.0
Vacant Units by Geography	49,620	18.0	29.6	31.5	20.9	0.0
Businesses by Geography	55,329	9.1	16.4	30.4	44.1	0.0
Farms by Geography	1,185	3.6	14.2	34.9	47.3	0.1
Family Distribution by Income Level	235,693	21.1	16.5	19.2	43.2	0.0
Household Distribution by Income Level	352,805	24.0	15.3	17.7	43.1	0.0
Median Family Income MSA - 13820 Birmingham-Hoover, AL MSA		\$59,532	Median Housing Value			\$168,218
			Median Gross Rent			\$751
			Families Below Poverty Level			10.0%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Huntsville MSA**Table A – Demographic Information of the Assessment Area****Assessment Area: Huntsville AL MSA 2017-2018**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	73	16.4	26.0	28.8	28.8	0.0
Population by Geography	346,438	10.8	20.8	31.2	37.2	0.0
Housing Units by Geography	152,720	12.3	21.9	32.1	33.7	0.0
Owner-Occupied Units by Geography	93,319	5.1	18.3	33.0	43.6	0.0
Occupied Rental Units by Geography	44,448	23.9	28.3	30.9	16.9	0.0
Vacant Units by Geography	14,953	22.7	25.3	30.2	21.8	0.0
Businesses by Geography	21,566	12.3	22.4	28.5	36.7	0.0
Farms by Geography	662	7.9	20.2	39.0	32.9	0.0
Family Distribution by Income Level	89,551	22.9	16.0	17.4	43.8	0.0
Household Distribution by Income Level	137,767	24.5	15.6	15.6	44.3	0.0
Median Family Income MSA - 26620 Huntsville, AL MSA		\$72,576	Median Housing Value			\$164,667
			Median Gross Rent			\$800
			Families Below Poverty Level			10.0%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area
Assessment Area: Huntsville AL MSA 2015 - 2016

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	73	13.7	23.3	31.5	31.5	0.0
Population by Geography	334,811	9.8	19.6	34.3	36.3	0.0
Housing Units by Geography	141,483	11.2	21.3	34.2	33.3	0.0
Owner-Occupied Units by Geography	89,162	4.2	16.2	37.5	42.0	0.0
Occupied Rental Units by Geography	37,402	23.8	30.9	28.0	17.2	0.0
Vacant Units by Geography	14,919	21.3	27.6	29.6	21.6	0.0
Businesses by Geography	20,586	12.1	21.4	30.1	36.4	0.0
Farms by Geography	587	6.8	14.5	48.0	30.7	0.0
Family Distribution by Income Level	83,887	21.7	15.5	18.3	44.5	0.0
Household Distribution by Income Level	126,564	24.1	15.4	16.4	44.1	0.0
Median Family Income MSA - 26620 Huntsville, AL MSA		\$67,829	Median Housing Value			\$152,958
			Median Gross Rent			\$670
			Families Below Poverty Level			8.6%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

() The NA category consists of geographies that have not been assigned an income classification.*

Tuscaloosa MSA**Table A – Demographic Information of the Assessment Area****Assessment Area: Tuscaloosa AL MSA 2017-2018**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	2.1	27.7	42.6	23.4	4.3
Population by Geography	200,458	1.8	20.1	43.6	29.6	4.9
Housing Units by Geography	87,064	1.5	22.6	47.5	25.6	2.7
Owner-Occupied Units by Geography	44,160	1.2	12.8	46.9	38.5	0.5
Occupied Rental Units by Geography	24,968	2.4	33.6	48.5	12.5	3.0
Vacant Units by Geography	17,936	1.1	31.6	47.6	12.1	7.6
Businesses by Geography	10,488	1.5	26.9	42.4	26.2	2.9
Farms by Geography	316	0.6	13.3	47.2	38.3	0.6
Family Distribution by Income Level	45,971	22.3	15.4	17.6	44.7	0.0
Household Distribution by Income Level	69,128	24.6	14.1	16.0	45.3	0.0
Median Family Income MSA - 46220 Tuscaloosa, AL MSA		\$56,265	Median Housing Value			\$169,496
			Median Gross Rent			\$782
			Families Below Poverty Level			13.4%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area**Assessment Area: Tuscaloosa AL MSA 2015- 2016**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	12.8	23.4	36.2	27.7	0.0
Population by Geography	194,656	10.8	18.3	38.6	32.4	0.0
Housing Units by Geography	82,789	9.4	20.4	39.9	30.3	0.0
Owner-Occupied Units by Geography	43,816	4.1	12.9	41.6	41.4	0.0
Occupied Rental Units by Geography	25,359	15.5	30.7	37.0	16.8	0.0
Vacant Units by Geography	13,614	15.2	25.3	39.6	19.8	0.0
Businesses by Geography	10,395	8.0	23.6	36.6	31.8	0.0
Farms by Geography	309	1.3	14.2	39.5	45.0	0.0
Family Distribution by Income Level	43,115	19.8	16.1	19.8	44.2	0.0
Household Distribution by Income Level	69,175	25.9	13.1	16.0	45.0	0.0
Median Family Income MSA - 46220 Tuscaloosa, AL MSA		\$54,868	Median Housing Value			\$150,390
			Median Gross Rent			\$729
			Families Below Poverty Level			11.3%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Alabama

For the state of Alabama, we completed full-scope reviews for the Birmingham MSA, Huntsville MSA, and Tuscaloosa MSA. We conducted limited-scope reviews for the Decatur MSA, Gadsden MSA, Montgomery MSA, and Alabama Non-MSA. Cadence's performance in the Birmingham MSA is weighted most heavily in arriving at the overall conclusion for the state as it provides the largest share of loans and deposits. Of the loans that were originated in Alabama from 2015 through 2018, 41.0 percent of loans were originated or purchased in the Birmingham MSA, 25.3 percent were in the Tuscaloosa MSA, 15.4 percent were in the Huntsville MSA, 6.2 percent were in the AL Non-MSA, 8.2 percent were in the Montgomery MSA, 1.9 percent were in the Decatur MSA, and 1.9 percent were in the Gadsden MSA. According to the June 30, 2018 FDIC Deposit Market Share Report for deposits in Alabama, 63.3 percent were in the Birmingham MSA, 12.2 percent were in the Huntsville MSA, 8.7 percent were in the AL Non-MSA, 8.7 percent were in the Tuscaloosa MSA, 2.7 percent were in the Montgomery MSA, 2.3 percent were in the Decatur MSA, and 1.9 percent were in the Gadsden MSA.

In the 2015 through 2016 evaluation period, Cadence originated 18 and eight, home mortgage loans in the Decatur and Gadsden MSAs, respectively. For the same time period, 10 and 16 small business loans were

originated in the Decatur and Gadsden MSAs, respectively. For the 2017 through 2018 evaluation period, Cadence originated 13 home mortgage loans in the Gadsden MSA and 16 small business loans in the Decatur MSA. A meaningful analysis cannot be derived from the limited number of small business and home mortgage loans originated in these MSAs, during the two evaluation periods and as such were not considered in the state's overall rating. The Alabama state rating is based primarily on the results of the areas that received full-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

LENDING TEST

Cadence performance under the Lending Test in Alabama is rated High Satisfactory.

Conclusions for areas Receiving Full-Scope Reviews

Based on full-scope reviews, Cadence's performance in the Birmingham MSA, Huntsville MSA, and Tuscaloosa MSA is good.

Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of its AAs, when considering the capacity to make loans, product offerings, and competition in its respective AAs.

Number of Loans* 2015 through 2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
AL Non-MSA	101	118	2	0	221	6.26%	8.7%
Birmingham MSA	899	534	13	4	1,450	41.06%	63.6%
Decatur MSA	39	26	1	0	66	1.87%	2.3%
Gadsden MSA	21	45	0	0	66	1.87%	1.9%
Huntsville MSA	374	161	7	3	545	15.43%	12.2%
Montgomery MSA	207	82	0	0	289	8.18%	2.7%
Tuscaloosa MSA	611	274	6	3	894	25.32%	8.6%

* The tables present the data for all Alabama AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000's) 2015 through 2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
AL Non-MSA	\$9,752	\$11,278	\$205	\$0	\$21,235	2.76%	8.7%
Birmingham MSA	\$250,100	\$91,194	\$297	\$14,175	\$355,766	46.32%	63.6%
Decatur MSA	\$3,695	\$3,238	\$25	\$0	\$6,958	0.91%	2.3%
Gadsden MSA	\$1,835	\$6,404	\$0	\$0	\$8,239	1.07%	1.9%
Huntsville MSA	\$73,878	\$23,185	\$1,434	\$11,577	\$110,074	14.33%	12.2%
Montgomery MSA	\$32,419	\$18,821	\$0	\$0	\$51,240	6.67%	2.7%
Tuscaloosa MSA	\$160,457	\$46,552	\$365	\$7,142	\$214,516	27.93%	8.6%

* The tables present the data for all Alabama AAs. The narrative below addresses performance in full-scope areas only.

Birmingham MSA

Cadence lending activity in the Birmingham MSA is adequate. Lending levels reflect adequate responsiveness to the credit needs of its AAs, when considering the capacity to make loans, product offerings, and competition in its respective AAs.

According to June 30, 2018 FDIC Deposit Market Share Report, Cadence had \$1.9 billion in deposits in the Birmingham MSA. Cadence had a 5.5 percent deposit market share in the AA. The market share ranks fifth out of 40 depository financial institutions. Cadence ranked in the top 12.5 percent for deposit market share in the AA.

According to 2017 peer mortgage data, Cadence has a 0.8 percent market share of home mortgage originations in the AA. Cadence's market share of home mortgage loans is well below its deposit market share. Cadence ranks 33 out of 434 lenders in the AA in originating home mortgage loans. This ranks in the top 7.6 percent of all home mortgage lenders in the AA. Cadence home mortgage market share ranking is stronger than its deposit market share ranking.

According to 2017 peer small business data, Cadence has a 0.7 percent market share of small business loan originations. Cadence's market share of small business loan originations is well below its deposit market share. Cadence ranks 26 out of 113 lenders in the AA making small business loans. This ranks in the top 23.0 percent of all institutions making small business loans. Cadence market share ranking of small business loan originations is below its deposit market share ranking.

Huntsville MSA

Cadence lending activity in the Huntsville MSA is adequate. Lending levels reflect adequate responsiveness to the credit needs of its AAs, when considering the capacity to make loans, product offerings, and competition in its respective AAs.

According to the June 30, 2018 FDIC Deposit Market Share Report, Cadence had \$373.9 million in deposits in the Huntsville MSA. Cadence had a 5.2 percent deposit market share. The deposit market

share ranks eight out of 28 depository financial institutions in the AA. Cadence ranked in the top 28.6 percent for deposit market share in the AA.

According to 2017 peer mortgage data, Cadence has a 0.4 percent market share of home mortgage originations in the AA. The market share of home mortgage originations is significantly below its deposit market share. The market share of home mortgage originations ranks 52 out of 303 lenders originating home mortgage loans in the AA. The home mortgage market share ranks in the top 17.2 of all home mortgage lenders in the AA. The market share ranking of home mortgage loans is stronger than its deposit market share ranking.

According to 2017 peer small business data, Cadence had a 0.7 percent market share of small business loan originations in the AA. The market share of small business loan originations is well below the deposit market share. Cadence ranked 26 out of 75 lenders originating small business loans. The market share ranking of small business loan originations was in the top 34.7 percent of all lenders originating small business loans in the AA. The market share ranking of small business loan originations is weaker than its deposit market share ranking.

Tuscaloosa MSA

Lending activity in the Tuscaloosa MSA is adequate. Lending levels reflect adequate responsiveness to the credit needs of the AAs, when considering the capacity to make loans, product offerings, and competition in the respective AAs.

According to the June 30, 2018 FDIC Deposit Market Share Report, Cadence had \$264.4 million in deposits in the Tuscaloosa MSA. Cadence had a 7.6 percent deposit market share in the AA. This ranked fifth out of 24 depository financial institutions in the Tuscaloosa MSA. Cadence ranked in the top 20.8 percent for deposit market share in the AA.

According to 2017 peer mortgage data, Cadence had a 2.2 percent market share of home mortgage loan originations. The market share of home mortgage loan originations was well below its deposit market share. The market share of home mortgage originations ranked 16 out of 251 home mortgage lenders in the AA. The market share ranking was in the top 6.4 percent of all home mortgage lenders in the AA. The home mortgage market share ranking was stronger than its deposit market share ranking.

According to 2017 peer small business data, Cadence had a 2.4 percent market share of small business loan originations in the AA. The market share of small business loan originations was well below its deposit market share. Cadence ranked 14 out of 72 small business lenders in the AA. Cadence ranked in the top 19.4 percent of all lenders for small business loan originations. The market share ranking is stronger than its deposit market share ranking. Cadence had a much larger average loan amount compared to the majority of lenders ranked ahead of Cadence in terms of small business loan originations. Cadence had a 7.2 percent market share of small business lending placing it in the top 8.3 percent of all small business lenders.

Distribution of Loans by Income Level of the Geography

Cadence exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Alabama section of appendix D for the facts and data used to evaluate the geographic distribution of home mortgage loan originations and purchases.

Birmingham MSA

The overall geographic distribution of home mortgage loans in the Birmingham MSA is good. The geographic distribution of home mortgage loans was excellent, 2017 through 2018. The proportion of mortgage loans in low-income CTs was somewhat below the percentage of owner-occupied housing in those geographies. The proportion of home mortgage loans in moderate-income CTs exceeded the percentage of owner-occupied housing in those geographies. The proportion of home mortgage loans in LMI CTs exceeded the aggregate distribution of home mortgage loans in those geographies. Cadence's performance was weaker in 2015 through 2016. Weaker performance was due to the proportion of loans in LMI CTs was well below the percentage of owner-occupied housing in those geographies. Weaker performance had a negative impact on the overall geographical distribution conclusions in the Birmingham MSA.

Huntsville MSA

The geographical distribution of home mortgage loans was excellent, 2017 through 2018. The proportion of home mortgage loans in low-income CTs was well below the percentage of owner-occupied housing in those geographies. The proportion of home mortgage loans in moderate-income CTs exceeded the percentage of owner-occupied housing in those geographies. The proportion of home mortgage loans in low-income CTs was below the aggregate distribution of home mortgage loans in those geographies. The proportion of home mortgage loans in moderate-income CTs exceeded the aggregate distribution in those geographies. Cadence performance 2015 through 2016 was stronger than its performance 2017 through 2018. Stronger performance is due to stronger demographic and aggregate performance in low-income CTs. Stronger performance had a positive impact on the overall geographical distribution rating in the Huntsville MSA.

Tuscaloosa MSA

The geographical distribution of home mortgage loans was good, 2017 through 2018. We gave more weight to performance in moderate-income CTs due to the low percentage of owner-occupied (1.2 percent) housing in low-income CTs. The proportion of home mortgage loans in low-income CTs was significantly below the percentage of owner-occupied housing in those geographies. The proportion of home mortgage loans in moderate-income CTs exceeded the percentage of owner-occupied housing in those geographies. The proportion of home mortgage loans in low-income CTs was significantly below the aggregate distribution of home mortgage loans in those geographies. The proportion of home mortgage loans in moderate-income CTs exceeded the aggregate distribution of home mortgage loans in those geographies. Cadence performance 2015 through 2016 was weaker than its performance 2017 through 2018. Weaker performance was due to weaker demographic and aggregate performance in moderate-income CTs. Weaker performance 2015 through 2016 had a neutral impact on the overall geographical distribution rating.

Small Loans to Businesses (Also referred in this document as “Loans to Small Businesses”)

Refer to Table Q in the state of Alabama section of appendix D for the facts and data used to evaluate the geographic distribution of originations and purchases of small loans to businesses.

Birmingham MSA

The geographical distribution of small loans to businesses was excellent, 2017 through 2018. The proportion of small loans to businesses in low-income CTs was somewhat near the percentage of businesses in those geographies. The proportion of small loans to businesses in moderate-income CTs exceeded the percentage of businesses in those geographies. The proportion of loans in low-income CTs was somewhat near to the aggregate distribution of small loans to businesses in those geographies. The proportion of small loans to businesses in moderate-income CTs exceeded the aggregate distribution of small loan to businesses in those geographies. Bank performance 2015 through 2016 is consistent with performance 2017 through 2018.

Huntsville MSA

The geographical distribution of small loans to businesses was good, 2017 through 2018. The proportion of small loans to businesses in low-income CTs was somewhat below the percentage of businesses in those geographies. The proportion of small loans to businesses in moderate-income CTs exceeded the percentage of businesses in those geographies. The proportion of small loans to businesses in low-income CTs was below the aggregate distribution of small loans to businesses in those geographies. The proportion of small loans to businesses in moderate-income CTs exceeded the aggregate distribution of businesses in those geographies. Performance 2015 through 2016 is consistent with performance 2017 through 2018.

Tuscaloosa MSA

The geographical distribution of small loans to businesses is adequate, 2017 through 2018. We gave more weight to performance in moderate-income CTs due to the low percentage (1.5 percent) of businesses in low-income CTs. The proportion of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies. The proportion of small loans to businesses in moderate-income geographies was below the percentage of businesses in those geographies. The proportion of small loans to businesses in low-income geographies was well below the aggregate distribution of small loans to businesses in those geographies. The proportion of small loans to businesses in moderate-income geographies was somewhat below aggregate distribution of small loans to businesses in those geographies. Performance 2015 through 2016 is consistent with performance 2017 through 2018.

Lending Gap Analysis

We reviewed lending summary reports and other supervisory data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

Cadence exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Alabama section of appendix D for the facts and data used to evaluate the borrower distribution of home mortgage loan originations and purchases.

Birmingham MSA

The distribution of home mortgage loans to borrowers of different income levels is good. Cadence exhibits excellent distribution of home mortgage loans to borrowers of different income levels, 2017

through 2018. The proportion of home mortgage loans to low-income borrowers was below the percentage of low-income families in the AA. The proportion of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. The proportion of home mortgage loans to LMI borrowers exceeded the aggregate distribution of mortgage loans to LMI borrowers in the AA. Cadence's performance in 2015 through 2016 was weaker than its performance 2017 through 2018. Weaker performance was due to weaker aggregate and demographic performance for moderate-income borrowers. Performance 2015 through 2016 had a negative impact on the overall borrower distribution rating in the Birmingham MSA.

Huntsville MSA

Cadence exhibits excellent distribution of home mortgage loans to borrowers of different income levels, 2017 through 2018. The proportion of home mortgage loans to low-income borrowers was near the percentage of low-income families in the AA. The proportion of low to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. The proportion of home mortgage loans to LMI borrowers exceeded the aggregate distribution of home mortgage loans to LMI borrowers in the AA. Cadence's performance 2015 through 2016 was weaker than its performance 2017 through 2018. Weaker performance was due to weaker demographic and aggregate performance providing home mortgage loans to moderate-income borrowers. Performance 2015 through 2016 had a neutral impact on the overall rating.

Tuscaloosa MSA

The distribution of home mortgage loans to borrowers of different income levels is adequate. Cadence exhibits good distribution of home mortgage loans to borrowers of different income levels, 2017 through 2018. The proportion of home mortgage loans to low-income borrowers was well below the percentage of low-income families in the AA. The proportion of home mortgage loans to moderate-income families exceeded the percentage of moderate-income families in the AA. The proportion of home mortgage loans to low-income borrowers was below the aggregate distribution of home mortgage loans to low-income borrowers in the AA. The proportion of home mortgage loans to moderate-income borrowers exceeded the aggregate distribution of home mortgage loans to moderate-income borrowers in the AA. Cadence performance 2015 through 2016 was weaker than performance 2017 through 2018. Weaker performance was due to weaker demographic and aggregate performance providing home mortgage loans to LMI borrowers. Performance 2015 through 2016 had a negative impact on the overall rating.

Small Loans to Businesses

Refer to Table R in the state of Alabama section of appendix D for the facts and data used to evaluate the borrower distribution of origination and purchase of small loans to businesses.

Birmingham MSA

Cadence exhibits a good borrower distribution of small loans to businesses by revenue, 2017 through 2018. The proportion of small loans to businesses (with revenue <\$1 million) was below the percentage of those businesses. The proportion of small loans to businesses exceeded the aggregate distribution of small loans to businesses in the AA. Cadence performance 2015 through 2016 was consistent with its performance 2017 through 2018.

Huntsville MSA

Cadence exhibits a good borrower distribution of small loans to businesses by revenue, 2017 through 2018. The proportion of small loans to businesses (with revenue <\$1 million) was somewhat below the percentage of those businesses. The proportion of small loans to businesses exceeded the aggregate

distribution of small loans to businesses in the AA. Performance 2015 through 2016 was consistent with its performance 2017 through 2018.

Tuscaloosa MSA

Cadence exhibits an adequate borrower distribution of small loans to businesses by revenue, 2017 through 2018. The proportion of small loans to businesses (with revenue <\$1 million) was well below the percentage of those businesses. The proportion of small loans to businesses exceeded the aggregate distribution of small loans to businesses in the AA. Performance 2015 through 2016 was consistent with its performance 2017 through 2018.

Community Development Lending

Cadence has made an adequate level of CD loans. CD lending had a neutral impact on the Lending Test rating in Alabama.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Birmingham MSA

Cadence made a low level of CD loans in the Birmingham MSA. Cadence made four CD loans totaling \$14.2 million. CD loan volume was equal to 5.2 percent of allocated tier 1 capital. CD loans were responsive to identified community needs. Cadence made three CD loans with affordable housing as the purpose. CD loans for affordable housing totaled \$8.7 million, which equaled 61.2 percent of CD lending in the AA. CD loans were not innovative or complex.

- Cadence made a CD loan for \$1.9 million to a nonprofit whose purpose is to provide senior living and skilled nursing care. Services are targeted to LMI seniors.
- Cadence made a CD loan for \$6.9 million to develop a 52-unit affordable housing senior living community. Affordable rents are available to LMI seniors.

Huntsville MSA

Cadence made an excellent level of CD loans in the Huntsville MSA. Cadence made three CD loans totaling \$11.6 million. CD loan volume was equal to 22.1 percent of allocated tier 1 capital. CD loans focused on community service. CD loans were not innovative or complex.

- Cadence made a \$1 million loan to construct multifamily units in a moderate-income CT. The project is intended for LMI individuals who have severe mental health issues, need family counseling services, substance abuse assistance, and other mental health issues.

Tuscaloosa MSA

Cadence made an excellent level of CD loans in the Tuscaloosa MSA. Cadence made three loans totaling \$7.1 million. CD loan volume was equivalent to 19.3 percent of allocated tier 1 capital. CD loans were responsive to identified community needs. CD loans focused on community services. CD loans were not innovative or complex.

- Cadence made a \$5 million loan to revitalize the community. The funds are being used to repair a levee and widen a road in LMI and distressed middle-income CTs. Proceeds from the loan will improve access to transportation and needed infrastructure to the AA.

Product Innovation and Flexibility

Cadence makes extensive use of innovative and/or flexible lending practices to serve AA credit needs.

Throughout the state of Alabama Cadence originated 226 loans within the CAHLP totaling \$32.1 million. Within the full-scope AAs in Alabama, Cadence originated 175 loans within the CAHLP, which totaled \$21.8 million. These flexible affordable home loans benefit LMI individuals.

Conclusions for Areas Receiving a Limited-Scope Review

Based on limited-scope reviews, performance under the Lending Test in the Alabama Non-MSA, Gadsden MSA, Decatur MSA, and Montgomery MSA are weaker than the overall Lending Test performance in the full-scope areas. Weaker performance in limited-scope AAs is due to the percentage of home mortgage loans in low-income CTs and is well below the percentage of owner-occupied housing in limited-scope AAs, 2017 through 2018. Performance in limited-scope reviews had a neutral impact on the Lending Test rating.

INVESTMENT TEST

Cadence's performance under the Investment Test in Alabama is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews the bank's performance in the Birmingham MSA and Tuscaloosa MSA is good. Performance in the Huntsville MSA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Alabama non-MSA	3	\$156	0	\$0	3	6.1%	\$156	0.4%	0	\$0
Birmingham MSA	3	\$382	19	\$22,604	22	49.0%	\$22,986	65.5%	2	\$7,381
Decatur MSA	1	\$52	2	\$297	3	6.1%	\$349	1.0%	0	\$0
Gadsden MSA	0	\$0	1	\$101	1	2.0%	\$101	0.3%	0	\$0
Huntsville MSA	3	\$974	6	\$6,114	9	18.5%	\$7,088	20.2%	1	\$1,200
Montgomery MSA	1	\$50	4	\$1,443	5	10.2%	\$1,493	4.3%	1	\$1,620
Tuscaloosa MSA	0	\$0	3	\$2,821	3	6.1%	\$2,821	8.1%	0	\$0
Alabama - Statewide	1	\$68	0	\$0	1	2.0%	\$68	0.2%	0	\$0
	12	\$1,682	35	\$33,380	47	100%	\$35,062	100%	4	\$10,201

* Prior Period Investments are investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments are legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Birmingham MSA

Based on the identified opportunities, the level of CD investments in this AA is good. Cadence had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

Qualified CD investments in the Birmingham MSA during the assessment period totaled \$23.0 million, consisting of equity investments, cash, and in-kind donations. During the evaluation period, the outstanding prior period investments were approximately \$382,000. Investments made in prior periods continue to have a positive impact on the AA. Total CD investments equal 8.4 percent of allocated tier 1 capital.

Of the \$23.0 million in qualified CD investments, \$121,000 consists of qualified grants and donations to CD organizations. Cadence made 16 investments in mortgage backed securities (MBS) totaling \$20.4

million. These investments benefitted affordable housing needs in the AA. In addition, Cadence invested \$2.0 million in a Small Business Investment Corporation (SBIC). These investments promoted economic development needs in the AA. Cadence exhibited good responsiveness to the credit and community development needs of the AA. Cadence does not use innovative or complex investments to support community development initiatives in the Birmingham MSA.

Huntsville MSA

Based on the identified opportunities, the level of CD investments in this AA is excellent. The institution had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

Qualified investments in the Huntsville MSA totaled \$7.1 million, consisting of equity investments, cash, and in-kind donations. During the evaluation period, the outstanding prior period investments were approximately \$974,000. Investments made in prior periods continue to have a positive impact on the AA. Total CD investments equaled 13.6 percent of allocated tier 1 capital.

Of the \$7.1 million in qualified CD investments, \$26,000 consists of qualified grants and donations to CD organizations. Cadence made seven investments in MBS totaling \$5.3 million. These investments benefitted affordable housing needs in the AA. In addition, Cadence made one CD investment in a SBIC totaling \$2.0 million. These investments promoted economic development needs in the AA. Cadence exhibited good responsiveness to credit and community development needs of the AA. Cadence does not use innovative and/or complex investments to support community development initiatives in the Huntsville MSA.

Tuscaloosa MSA

Based on the identified CD investment opportunities, Cadence level of CD investments in this AA is good. Cadence had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

Qualified investments in the Tuscaloosa MSA during the assessment period totaled \$2.8 million, consisting of equity investments, cash, and in-kind donations. During the evaluation period, there were no outstanding prior period investments. Total CD investments equaled 7.6 percent of allocated tier 1 capital.

Of the \$2.8 million in qualified CD investments, \$23,000 consists of qualified grants and donations to CD organizations. Cadence made three investments in MBS totaling \$2.8 million. These investments benefitted affordable housing needs in the AA. Cadence exhibited good responsiveness to the identified community needs of the AA. Cadence does not use innovative and/or complex investments to support community development initiatives in the Tuscaloosa MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, performance under the Investment Test in the Alabama Non-MSA, Decatur MSA, and Gadsden MSA is weaker than the overall performance under the Investment Test in the full-scope areas. Weaker performance is due to a lower percentage of CD investments compared to allocated tier 1 capital. Weaker performance in the Alabama Non-MSA and the Decatur and Gadsden MSAs had a neutral impact on the Investment Test rating. Based on a limited-scope review, performance under the Investment Test in the Montgomery MSA is consistent with performance in the full-scope areas.

SERVICE TEST

Cadence performance under the Service Test in Alabama is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, Cadence performance in the Birmingham MSA and Huntsville MSA is adequate, and performance in the Tuscaloosa MSA is good.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Brchs	% of Rated Area Brchs in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Alabama Non-MSA	8.7	6	24.0	0	83.3	16.7	0	1.2	17.1	54.1	27.6
Birmingham MSA	63.6	9	36.0	0	22.2	44.4	33.3	14.1	24.5	28.2	32.3
Decatur MSA	2.3	2	8.0	0	0	100	0	7.4	14.8	48.2	31.2
Gadsden MSA	1.9	1	4.0	0	0	100	0	6.4	23.0	43.5	16.7
Huntsville MSA	12.2	4	16.0	0	25	25	50	10.8	20.8	31.2	28.8
Montgomery MSA	2.7	1	4.0	0	0	0	100	14.9	28.9	25.0	30.9
Tuscaloosa MSA	8.6	2	8.0	0	50	0	50	1.8	20.1	43.6	29.6

*2015 ACS Census, N/A CTs not listed, may not total 100.0

Birmingham MSA

Branch delivery systems are reasonably accessible to geographies and individuals of different income levels in the Birmingham MSA. Overall, there are nine full-service branches in the MSA. Cadence has no branches in low-income CTs and two branches located in moderate-income CTs. The percentage of branch offices located in low-income CTs is significantly lower than the percentage of the population within the low-income CTs. The percentage of branch offices located in moderate-income CTs is near the percentage of the population within the moderate-income CTs.

Huntsville MSA

Branch delivery systems are reasonably accessible to geographies and individuals of different income levels in the Huntsville MSA. Overall, there are four full-service branches in the MSA. Cadence has no

branches in low-income CTs and one branch located in a moderate-income CT. The percentage of branch offices in low-income CTs is significantly lower than the percentage of the population within the low-income CTs. The percentage of branch offices located in moderate-income CTs exceeds the percentage of the population within the moderate-income CTs.

Tuscaloosa MSA

Branch delivery systems are readily accessible to geographies and individuals of different income levels. Overall, there are two full-service branches in the MSA. We considered the fact that only 1.8 percent of the population lives in low-income geographies. Cadence has no branches in low-income CTs, but has one branch located in a moderate-income CT. The percentage of branch offices located in low-income CTs is somewhat lower than the percentage of the population within the low-income CTs. However, the percentage of branch offices located in moderate-income CTs exceeds the percentage of the population within the moderate-income CTs.

	Distribution of Branch Openings/Closings					
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Birmingham MSA	0	1	0	0	0	-1
Huntsville MSA	0	1	0	0	0	-1
Tuscaloosa MSA	1	2	0	0	0	-1

Birmingham MSA

To the extent changes have been made, opening and closing of branches has not adversely affected the accessibility of delivery systems, particularly in LMI geographies and/or to LMI individuals. Cadence closed one branch location within the Birmingham MSA during the evaluation period. The closed branch was located in an upper-income CT and did not have an effect on the AA's LMI CTs or its LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the MSA, particularly LMI CTs or LMI individuals. Services offered, and hours of operation are comparable among locations regardless of the income level of the CT that each branch is located in.

Huntsville MSA

To the extent changes have been made, opening and closing of branches has not adversely affected the accessibility of delivery systems, particularly in LMI geographies and/or LMI individuals. Cadence closed one branch location within the Huntsville MSA during the evaluation period. The closed branch was located in an upper-income CT and did not have an effect on the AA's LMI CTs or its LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the MSA, particularly LMI CTs or LMI individuals. Services offered, and hours of operation are comparable among locations regardless of the income level of the CT that each branch is located in.

Tuscaloosa MSA

To the extent changes have been made, opening and closing of branches has not adversely affected the accessibility of delivery systems, particularly in LMI geographies and/or LMI individuals. Cadence opened one branch location and closed two branch locations within the Tuscaloosa MSA during the evaluation period. A branch located in a moderate-income CT was opened immediately after another branch was closed in the same CT. In addition to this, another branch was closed that was located in an upper-income CT. The overall net effect on the MSA was a decrease of one branch in an upper-income CT.

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the MSA, particularly LMI CTs or LMI individuals. Services offered, and hours of operation are comparable among locations regardless of the income level of the CT that each branch is located in.

Community Development Services

Cadence provides a relatively high level of CD services.

Birmingham MSA

Performance in providing CD services in the Birmingham MSA is excellent. During the evaluation period, 46 employees provided expertise to 41 different CD organizations for a total of 3,348 service hours. Some of these services included participating on the board of directors for community organizations that provided services to the local community and by conducting financial literacy courses and seminars to benefit LMI individuals and children of LMI families. These courses included topics pertaining to budgeting, saving, and how to qualify and apply for a home mortgage loan.

Huntsville MSA

Performance in providing CD services in the Huntsville MSA is poor. During the evaluation period, 18 employees provided their expertise to nine different CD organizations for a total of 204 service hours. This represents adequate responsiveness to the needs of the community. Many of these services focused on providing financial literacy education as well as other community services to LMI individuals.

Tuscaloosa MSA

Performance in providing CD services in the Tuscaloosa MSA is adequate. During the evaluation period, 53 employees provided their expertise to 24 different CD organizations for a total of 324 service hours. Several of these services included some of these employees participating on the board of directors for non-profit organizations that provided services to those in need within the community and by conducting financial literacy classes to LMI individuals and children of LMI families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, performance under the Service Test in the Decatur MSA, Gadsden MSA, and Montgomery MSA is consistent with the overall performance under the Service Test in the full-scope areas. Cadence's performance in the Alabama Non-MSA was stronger than its performance in the full-scope AAs. Stronger performance was due to excellent branch distribution in moderate-income CTs. Performance in the limited-scope AAs had a neutral impact on the overall rating.

State Rating

State of Florida

CRA rating for the state of Florida: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent geographical distribution of loans and good borrower distribution of loans.
- Adequate level of CD loans. CD loans for affordable housing were responsive to identified community needs.
- A good level of qualified CD investments. CD investments for affordable housing were responsive to identified community needs.
- Branches and services are accessible to geographies and individual of different income levels. Good level of CD services in the Tampa MSA.

Description of Institution's Operations in Florida

As of December 31, 2018, Cadence had four AAs within the state of Florida. These AAs include the Homosassa Springs MSA comprised of Citrus County; the North Port-Sarasota-Bradenton MSA (North Port-Sarasota MSA) comprised of Manatee and Sarasota Counties; the Ocala MSA comprised of Marion County; and the Tampa-St. Petersburg-Clearwater MSA (Tampa MSA) comprised of Hernando, Hillsborough, Pasco, and Pinellas Counties.

Cadence offers a full range of loan and deposit products and services through 14 full service branches within Florida. The branches represent 21.2 percent of the total branch network. Cadence has a total of 12 ATMs situated throughout the state, three of which are deposit-taking. During the evaluation period, 14.9 percent of deposits and 12.3 percent of loans were from Florida. As of June 30, 2018, Cadence held deposits totaling \$1.4 billion in Florida, which represented a 0.2 percent market share and ranked number 42 out of 212 institutions with operations in Florida. The state's largest depository institutions are Bank of America, NA, Wells Fargo, NA, SunTrust Bank, and JPMorgan Chase, NA who held a combined 47.3 percent market share. The most significant AA in the state, in terms of lending and deposits, is the Tampa MSA, which accounted for 59.2 percent of deposits and 46.3 percent of loans in the state.

Homosassa Springs MSA

Moderate competition exists for financial services within the Homosassa Springs MSA. Based on the June 30, 2018 FDIC Deposit Market Share Report, Cadence ranked fifth of 12 depository financial institutions in the AA, with a 6.7 percent market share and \$155.7 million in deposits. Competition includes large regional banks along with several institutions with a nationwide presence. The top four competitors, in order of their ranking, are SunTrust Bank, Bank of America, NA, Brannen Bank, and Regions Bank. These four competitors accounted for 71.9 percent of the deposit market share within the Homosassa Springs MSA.

To help identify needs and opportunities in the Homosassa Springs MSA, the OCC utilized a regulatory agency contact with a nonprofit organization whose programs include building and selling new homes, rehabilitating homes, managing rental properties, and financial education. The community contact indicated that there is a need for down payment assistance programs and access to flexible lending products geared to LMI individuals, particularly in the rural areas. Additional identified community development needs were increased bank participation in homebuyer classes and serving as nonprofit board members, low-cost checking accounts, and additional financial education resources. According to the U.S. Bureau of Labor Statistics, as of December 31, 2018, the unemployment rate in the Homosassa MSA was 4.9 percent, which was higher than the national average of 3.9 percent.

Tampa MSA

Substantial competition exists for financial services within the Tampa MSA. Based on the June 30, 2018 FDIC Deposit Market Share Report, Cadence ranked 16 of 56 depository financial institutions in the AA, with a 1.0 percent market share and \$836.3 million in deposits. Competition includes several large institutions with a nationwide presence and large regional banks. The top four competitors, in order of their ranking, are Raymond James Bank, NA, Bank of America, NA, Wells Fargo, NA, and SunTrust Bank. These four competitors accounted for 63.0 percent of the deposit market share within the Tampa MSA.

To further our understanding of the Tampa MSA community's credit needs, the OCC utilized a contact with an economic development organization that provides assistance to small businesses looking to expand in the Tampa MSA. The organization provides assistance in identifying incentives and guides businesses through qualification processes at the local and state level, as well as provides assistance with relocating and expanding. The contact indicated that population growth for the MSA is projected to be significantly faster than the state of Florida. Accordingly, it was indicated that there is a general credit need for affordable housing and access to new capital for existing business. Furthermore, the contact identified potential opportunities for financial institution involvement, specifically with the Hillsborough County government, as a result of initiatives being developed.

Please refer to the Demographic Information for the state of Florida in Table A below for detailed demographics and other performance context information for AAs that received full-scope reviews.

Homosassa Springs MSA**Table A – Demographic Information of the Assessment Area****Assessment Area: Homosassa Springs FL MSA 2017-2018**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	0.0	21.4	60.7	14.3	3.6
Population by Geography	139,654	0.0	21.9	59.8	18.3	0.0
Housing Units by Geography	77,819	0.0	21.5	60.9	17.6	0.0
Owner-Occupied Units by Geography	49,534	0.0	20.1	62.7	17.3	0.0
Occupied Rental Units by Geography	11,478	0.0	28.2	54.9	16.9	0.0
Vacant Units by Geography	16,807	0.0	21.0	59.8	19.1	0.0
Businesses by Geography	11,420	0.0	16.0	63.5	20.5	0.0
Farms by Geography	607	0.0	18.8	64.3	17.0	0.0
Family Distribution by Income Level	39,016	18.2	19.4	22.5	39.9	0.0
Household Distribution by Income Level	61,012	21.6	18.4	18.2	41.8	0.0
Median Family Income MSA - 26140 Homosassa Springs, FL MSA		\$47,829	Median Housing Value			\$118,117
			Median Gross Rent			\$812
			Families Below Poverty Level			11.4%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area**Assessment Area: Homosassa Springs FL MSA 2015 – 2016**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	0.0	11.1	74.1	14.8	0.0
Population by Geography	141,236	0.0	9.3	74.9	15.8	0.0
Housing Units by Geography	76,813	0.0	8.5	77.5	14.0	0.0
Owner-Occupied Units by Geography	50,720	0.0	8.1	75.5	16.4	0.0
Occupied Rental Units by Geography	9,254	0.0	12.3	80.5	7.2	0.0
Vacant Units by Geography	16,839	0.0	7.6	82.0	10.4	0.0
Businesses by Geography	10,948	0.0	8.9	75.1	16.0	0.0
Farms by Geography	540	0.0	12.4	70.4	17.2	0.0
Family Distribution by Income Level	39,799	17.5	20.5	21.4	40.6	0.0
Household Distribution by Income Level	59,974	21.5	17.8	19.6	41.1	0.0
Median Family Income MSA - 26140 Homosassa Springs, FL MSA		\$45,568	Median Housing Value			\$148,984
			Median Gross Rent			\$773
			Families Below Poverty Level			9.6%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Tampa MSA**Table A – Demographic Information of the Assessment Area****Assessment Area: Tampa FL MSA 2017-2018**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	746	5.5	26.1	36.3	29.8	2.3
Population by Geography	2,888,458	4.5	24.4	38.0	32.7	0.4
Housing Units by Geography	1,368,924	4.3	25.4	39.2	30.9	0.2
Owner-Occupied Units by Geography	737,411	1.9	21.9	39.7	36.5	0.1
Occupied Rental Units by Geography	408,090	8.5	29.3	38.6	23.2	0.4
Vacant Units by Geography	223,423	4.7	30.0	38.8	26.3	0.1
Businesses by Geography	300,326	4.0	20.8	35.3	39.7	0.3
Farms by Geography	7,867	2.5	24.4	39.8	33.2	0.1
Family Distribution by Income Level	702,244	21.6	17.9	19.1	41.4	0.0
Household Distribution by Income Level	1,145,501	24.0	16.3	17.5	42.2	0.0
Median Family Income MSA - 45300 Tampa-St. Petersburg- Clearwater, FL MSA		\$58,916	Median Housing Value			\$155,283
			Median Gross Rent			\$979
			Families Below Poverty Level			11.2%

*Source: 2015 ACS Census and 2018 D&B Data**Due to rounding, totals may not equal 100.0**(*) The NA category consists of geographies that have not been assigned an income classification.*

Table A – Demographic Information of the Assessment Area
Assessment Area: Tampa FL MSA 2015 – 2016

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	742	4.4	25.7	41.2	27.4	1.2
Population by Geography	2,783,243	3.6	25.1	41.4	29.7	0.2
Housing Units by Geography	1,336,484	3.3	26.1	42.1	28.4	0.0
Owner-Occupied Units by Geography	782,399	1.8	22.2	43.8	32.2	0.0
Occupied Rental Units by Geography	340,764	6.7	33.1	39.9	20.3	0.0
Vacant Units by Geography	213,321	3.6	29.4	39.7	27.3	0.0
Businesses by Geography	285,030	2.8	21.3	38.6	37.1	0.1
Farms by Geography	7,292	2.2	22.5	43.5	31.7	0.0
Family Distribution by Income Level	698,563	20.7	18.5	19.7	41.0	0.0
Household Distribution by Income Level	1,123,163	22.8	16.9	18.6	41.7	0.0
Median Family Income MSA - 45300 Tampa-St. Petersburg-Clearwater, FL MSA		\$57,333	Median Housing Value			\$198,240
			Median Gross Rent			\$918
			Families Below Poverty Level			9.4%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

() The NA category consists of geographies that have not been assigned an income classification.*

Scope of Evaluation in Florida

For the state of Florida, we completed full-scope reviews for the Homosassa Springs MSA and Tampa MSA and a limited-scope review for the Ocala MSA and Northport-Sarasota MSA. Cadence's performance in the Tampa MSA is weighted most heavily in arriving at the overall conclusion for the state as it provides the largest share of loans and deposits in Florida. Of the loans originated in Florida from 2015 through 2018, 46.3 percent were originated or purchased in the Tampa MSA, 38.4 percent were in the Northport-Sarasota MSA, 10.0 percent were in the Homosassa Springs MSA, and 5.4 percent were in the Ocala MSA. Based on the FDIC's 2017 deposit market share report, of the deposits in Florida, 59.3 percent were in the Tampa MSA, 25.4 percent were in the Sarasota MSA, 11.1 percent were in the Homosassa Springs MSA, and 4.3 percent were in the Ocala MSA. The Tampa MSA also has the most branch offices within the state.

In the 2015 through 2016 evaluation period, Cadence originated 10 small business loans in the Homosassa Springs MSA and eight in the Ocala MSA. A meaningful analysis cannot be derived from the limited number of small business loans originated in these MSAs during the 2015 through 2016 evaluation period.

and as such were not considered in the state's overall rating. The Florida state rating is based primarily on the results of the areas that received full-scope reviews. There were no low-income CTs in the Homosassa Springs MSA, thus geographical distribution of home mortgage loans and small loans to businesses will only consider performance in moderate-income CTs in the Homosassa Springs MSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

Performance under the Lending Test in Florida is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, performance in the Tampa MSA is good and performance in the Homosassa Springs MSA is good.

Lending Activity

Lending levels reflect good responsiveness to the credit needs of its AAs, when considering the bank's market share of deposits, capacity to make loans, product offerings, and competition in its respective AAs.

Number of Loans* 2015-2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Homosassa Springs MSA	86	50	1	0	137	9.90%	11.1%
North Port -Sarasota MSA	180	344	0	1	525	38.21%	25.4%
Ocala MSA	52	22	10	1	85	5.60%	4.3%
Tampa MSA	265	367	2	4	638	46.29%	59.2%
Statewide	N/A	N/A	N/A	11	11	N/A	N/A

* The tables present the data for all Florida AAs and statewide CD loans. The narrative below addresses performance in full-scope AAs only.

Dollar Volume of Loans* 2015 – 2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Homosassa Springs MSA	\$9,096	\$2,684	\$100	\$0	\$11,880	3.88%	11.1%
North Port - Sarasota MSA	\$54,343	\$73,886	\$0	\$4,600	\$132,829	43.42%	25.4%
Ocala MSA	\$5,935	\$2,560	\$1,880	\$119	\$10,494	3.43%	4.3%
Tampa MSA	\$73,117	\$63,594	\$224	\$13,760	\$150,695	49.26%	59.2%
Statewide	N/A	N/A	N/A	\$36,765	\$36,765	N/A	N/A

* The tables present the data for all Florida AAs and statewide CD loans. The narrative below addresses performance in full-scope AAs only.

Homosassa Springs MSA

Cadence lending activity in the Homosassa Springs MSA is good. According to the June 30, 2018, FDIC Deposit Market Share Report, Cadence had a deposit market share of 6.7 percent. The deposit market share ranked fifth out of 12 depository financial institutions, which ranked in the top 41.7 percent of all banks in the AA.

According to 2017 peer mortgage data, Cadence had a 0.23 percent market share of home mortgage originations in the AA. Market share is weaker than its deposit market share. Cadence ranked 62 out of 354 lenders, ranking in the top 17.5 percent of lenders providing home mortgage loans in the AA. The home mortgage market share ranking was stronger than the deposit market share ranking.

According to 2017 peer small business data, Cadence had a 0.7 percent market share of small business loan originations. The market share of small business loan originations is weaker than its deposit market share. Cadence ranked 19th out of 68 small business lenders, which ranked in the top 27.9 percent of all banks originating small business loans. The small business loan origination market share ranking was stronger than the banks deposit market share ranking.

Tampa MSA

Cadence lending activity in the Tampa MSA is good. According to the June 30, 2018 FDIC Deposit Market Share Report, Cadence had a deposit market share of 0.98 percent. The deposit market share ranked 16th out of 56 depository financial institutions, which ranked in the 28.5 percent of all banks in the AA.

According to 2017 peer mortgage data, Cadence had a 0.04 percent market share of home mortgage originations in the AA. The market share of home mortgage originations is weaker than its deposit market share. Cadence ranked 222 out of 939 lenders, which ranked in the top 23.6 percent of lenders providing home mortgage loans in the AA. The home mortgage market share ranking was stronger than the deposit market share ranking.

According to 2017 peer small business data, Cadence had a 0.1 percent market share of small business loan originations. The market share of small business loan originations is weaker than its deposit market share. Cadence ranked 46th out of 175 small business lenders, which ranked in the top 26.2 percent of all banks originating small business loans. The market share ranking of small business loan originations was stronger than the deposit market share ranking.

Distribution of Loans by Income Level of the Geography

Cadence exhibits excellent geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of home mortgage loan originations and purchases.

Homosassa Springs MSA

The geographic distribution of loans is excellent, 2017 through 2018. The proportion of mortgage loans in moderate-income CTs exceeded the percentage of owner-occupied housing in the AA. The proportion of mortgage loans in moderate-income CTs is comparable to the aggregate distribution of mortgage loans in those geographies. Performance 2015 through 2016 was consistent with its performance in 2017 through 2018.

Tampa MSA

The geographic distribution of loans is excellent, 2017 through 2018. The proportion of mortgage loans in LMI CTs exceeded the percentage of owner-occupied housing in the AA. The proportion of mortgage loans in LMI CTs exceeded the aggregate distribution of mortgage loans in those geographies. Performance 2015 through 2016 was consistent with performance rating 2017 through 2018.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of originations and purchases of small loans to businesses.

Homosassa Springs MSA

The geographic distribution of small loans to businesses is adequate, 2017 through 2018. The proportion of small loans to businesses in moderate-income CTs was somewhat below the percentage of businesses in those geographies. The proportion of small loans to businesses was somewhat below the aggregate distribution of small loans to businesses in moderate CT geographies. There were only 10 small loans to businesses in 2015 and 2016 and a meaningful analysis cannot be derived.

Tampa MSA

The geographic distribution of small loans to businesses is excellent, 2017 through 2018. The proportion of small loans to businesses in LMI CTs exceeded the percentage of businesses in those geographies. The proportion of small loans to business in LMI CTs exceeded the aggregate distribution of small loans to businesses in LMI geographies. Performance 2015 through 2016 was consistent with performance 2017 through 2018.

Lending Gap Analysis

We reviewed lending summary reports and other supervisory data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

Cadence exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of home mortgage loan originations and purchases.

Homosassa Springs MSA

Cadence exhibits an excellent distribution of home mortgage loans among individuals of different income levels, 2017 through 2018. The proportion of mortgage loans to low-income borrowers is well below the percentage of low-income families in the AA. The proportion of mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. Performance providing home mortgage loans to LMI borrowers exceeded the aggregate distribution of mortgage loans to LMI families. Performance providing home mortgage loans to borrowers of different income levels in 2015 through 2016 was consistent with performance 2017 through 2018.

Tampa MSA

Cadence exhibits a good distribution of home mortgage loans among individuals of different income levels, 2017 through 2018. The proportion of home mortgage loans to LMI borrowers was below the percentage of LMI families in the AA. Performance exceeded the aggregate distribution of home mortgage loans to low-income families in the AA. Performance substantially meets the aggregate distribution of home mortgage loans to moderate-income borrowers. Performance providing home mortgage loans to borrowers of different income levels 2015 through 2016 was consistent with performance ratings 2017 through 2018.

Small Loans to Businesses

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Homosassa Springs MSA

Cadence exhibits an excellent distribution of loans among businesses of different sizes, 2017 through 2018. The proportion of small loans to businesses (with revenue <\$1 million) exceeded the percentage of those businesses. The proportion of small loans to businesses exceeded the aggregate distribution of small loans to businesses. There were only eight small loans to businesses during 2015 and 2016 and a meaningful analysis cannot be derived.

Tampa MSA

Cadence exhibits an adequate distribution of loans among businesses of different sizes. Cadence exhibits a good distribution of loans to businesses of different sizes 2017 through 2018. The proportion of small loans to businesses (with revenue <\$1 million) is below the percentage of those businesses. The proportion of small loans to businesses exceeded the aggregate distribution of small loans to businesses. Performance in 2015 through 2016 was weaker than performance 2017 through 2018. Weaker performance was due to weaker aggregate and demographic performance. Weaker performance had a negative impact on the performance evaluation.

Community Development Lending

Cadence has made an adequate level of CD loans. CD loans had a neutral impact on the Lending Test rating in Florida.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Homosassa Springs

Cadence has not made any CD loans in the Homosassa Springs MSA throughout the evaluation period. CD lending performance had a negative impact on the Lending Test rating in Homosassa Springs.

Tampa MSA

Cadence made a relatively high level of CD loans in the Tampa MSA. Cadence made four CD loans for a total of \$13.8 million. CD loan volume was equal to 11.8 percent of allocated tier 1 capital. Some CD loans were responsive to the AA identified community needs. CD lending efforts focused on affordable housing and community service in the Tampa MSA. CD loans for affordable housing were responsive to identified community needs.

- Cadence made a \$5.0 million loan for construction of a 78-unit building where all residents will earn 60 percent or less than the AA average median income.

Product Innovation and Flexibility

Cadence makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs in the state of Florida. Cadence made 16 CAHLP loans totaling \$2.1 million within the state of Florida.

Conclusions for Areas Receiving a Limited-Scope Review

Based on limited-scope reviews, performance under the Lending Test in the Ocala MSA and North Port - Sarasota MSA is consistent with the overall performance under the Lending Test in the full-scope areas.

INVESTMENT TEST

Performance under the Investment Test in Florida is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, performance in the Tampa MSA is excellent. Based on full-scope reviews, performance in the Homosassa Springs MSA is poor.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Homosassa Springs MSA	0	\$0	2	\$154	2	7.4%	\$154	0.7%	0	\$0
Northport-Sarasota MSA	2	\$131	7	\$4,183	9	33.3%	\$4,314	20.3%	0	\$0
Ocala MSA	0	\$0	2	\$350	2	7.4%	\$350	1.7%	0	\$0
Tampa MSA	4	\$1,627	10	\$14,765	14	51.9%	\$16,392	77.3%	3	\$7,009
Totals	6	\$1,758	21	\$19,452	27	100%	\$21,210	100%	3	\$7,009

* Prior Period Investments are investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments are legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Homosassa Springs-MSA

Cadence has a poor level of qualified CD investments and grants, and was not in a leadership position, particularly those that are not routinely provided by private investors.

Qualified investments in the Homosassa Springs MSA during the assessment period totaled \$154,000 consisting of equity investments. During the evaluation period, there were no outstanding prior period investments. Total CD investments equaled 0.7 percent of allocated tier 1 capital. All CD investments were MBS benefitting affordable housing.

Cadence exhibited poor responsiveness to identified community needs of the AA. Cadence does not use innovative or complex CD investments to support community development initiatives.

Tampa MSA

Cadence has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified investments in the Tampa MSA during the assessment period totaled \$16.4 million, consisting of equity investments and donations. During the evaluation period, the outstanding prior period investments were approximately \$1.6 million. Investments made in prior periods continue to have a positive impact on the AA. Total CD investments equaled 14.0 percent of allocated tier 1 capital.

Of the \$16.4 million in qualified CD investments, \$28,000 consists of qualified grants and donations to CD organizations. Cadence made seven investments in MBS totaling \$7.7 million. These investments benefitted affordable housing. In addition, Cadence invested \$1.1 million in a SBIC. These investments promoted economic development needs in the AA. Cadence exhibited good responsiveness to the identified community needs of the AA. Cadence makes occasional use of innovative or complex CD investments to support community development initiatives.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, performance in the Sarasota MSA is consistent with performance in the full-scope AAs. Performance in the Ocala MSA is weaker than the performance in the full-scope AAs. Weaker performance is due to a smaller percentage of qualified CD investments compared to allocated tier 1 capital. Weaker performance had a neutral impact on the Investment Test rating, due to the fact the Ocala MSA is relatively small market when compared to other Florida AAs.

SERVICE TEST

Performance under the Service Test in Florida is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, performance in the Homosassa Springs MSA is adequate, and performance in the Tampa MSA is good.

Retail Banking Services

Service delivery systems are reasonably accessible to all portions of the geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Homosassa Springs MSA	11.1	2	14.3	0.0	0.0	100	0.0	0.0	21.9	60.7	14.3
North Port Sarasota MSA	25.4	3	21.4	0.0	66.7	33.3	0.0	2.8	23.7	47.5	26.0
Ocala MSA	4.3	1	7.1	0.0	0.0	100.0	0.0	2.3	18.5	63.6	15.7
Tampa MSA	59.2	8	57.1	0.0	25.0	37.5	37.5	4.5	24.4	38.0	32.7

*2015 ACS Census, N/A CTs not listed, may not total 100.0

Homosassa Springs MSA

Cadence branch delivery systems are reasonably accessible to geographies and individuals of different income levels in the Homosassa Springs MSA. Our rating considered the fact there are no low-income CTs in the AA and Cadence has a limited branch presence with two locations. The percentage of branches in moderate-income CTs is lower than the percentage of the population within the moderate-income CTs.

Cadence did not open or close branches during the evaluation period in the Homosassa Springs MSA. Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Services offered, and hours of operation are comparable among locations regardless of the income level of the CT that each branch is located in.

Tampa MSA

Cadence branch delivery systems are accessible to geographies and individuals of different income levels in the Tampa MSA. Overall, there are eight full-service branches in the MSA. Cadence has no branches in low-income CTs and two branches located in moderate-income CTs. The percentage of branches in low-income CTs is lower than the percentage of the population within the low-income CTs. The percentage of branches in moderate-income CTs exceeds the percentage of the population within the moderate-income CTs.

Cadence did not open or close branches during the evaluation period in the Tampa MSA. Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Services offered, and hours of operation are comparable among locations regardless of the income level of the CT that each branch is located in.

Community Development Services

Cadence provides a relatively high level of CD services.

Homosassa Springs MSA

Performance in providing CD services in the Homosassa Springs MSA is adequate. During the evaluation period, 15 employees provided expertise to nine different CD organizations for a total of 143 service hours. This represents an adequate response to the needs of the community. CD services in this area focused on providing financial literacy education as well as other community services to LMI individuals.

Tampa MSA

Performance in providing CD services in the Tampa MSA is good. During the evaluation period, 57 employees provided expertise to 41 different CD organizations for a total of 1,645 service hours. Some of these services included participating on the board of directors for community organizations that provided services to the local community and by conducting financial literacy courses and seminars to benefit LMI individuals and children of LMI families. In addition to this, disaster relief was provided to help the local community recover from hurricane damage in the area.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, performance under the Service Test in the North Port-Sarasota MSA is consistent with the overall performance under the Service Test when compared to the performance in full-scope AAs. Performance in the Ocala MSA was weaker than performance in full-scope areas. Weaker performance was due to no AA branches located in LMI geographies. Weaker performance had a neutral impact on the overall rating due to the limited presence in this AA.

State Rating

State of Mississippi

CRA rating for the state of Mississippi:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Adequate geographical distribution of loans and good borrower distribution of loans. Cadence originated an adequate level of CD loans.
- Cadence made a significant level of CD investments in Mississippi. CD investments supported affordable housing, community service, and economic development.
- Cadence's branch delivery systems are reasonably accessible to geographies and individuals of different income levels. Cadence provided a poor level of CD services.

Description of Institution's Operations in Mississippi

As of December 31, 2018, Cadence has one AA within the state of Mississippi consisting of five counties located in non-metropolitan statistical areas. The Mississippi Non-MSA is comprised of Clay County and the contiguous counties of Lowndes, Monroe, and Oktibbeha. Neshoba County is the other county included in the Mississippi Non-MSA and is non-contiguous.

Cadence offers a full range of loan, deposit products, and services through 11 full service branches within Mississippi. The branches represent 16.7 percent of the total branch network. Cadence has a total of nine ATMs within the state, five of which are deposit-taking. During the evaluation period, 7.2 percent of deposits and 12.3 percent of loans were from Mississippi. As of June 30, 2018, Cadence held deposits totaling \$690.6 million in Mississippi, which represented a 1.3 percent market share and ranked number 15 out of 94 institutions with operations in Mississippi. The state's largest depository institutions are Trustmark National Bank, Regions Bank, BancorpSouth Bank, Renasant Bank, and Hancock Whitney Bank with a combined 50.2 percent market share.

Mississippi Non-MSA

Moderate competition exists for financial services within the Mississippi Non-MSA. Based on the June 30, 2018 FDIC Deposit Market Share Report, Cadence ranked first of 16 depository financial institutions in the AA, with a 19.3 percent market share and \$691 million in deposits. Competition includes large regional banks. The top four competitors accounted for 50.7 percent of the deposit market share within the Mississippi Non-MSA.

To help identify needs and opportunities the OCC utilized three regulatory agency contacts in the Mississippi Non-MSA counties. The community contacts indicated that there is a need for new and rehabilitated affordable housing, specialized affordable housing loans, including construction and rehab

loans, and affordable retail deposit accounts. Additional identified community development needs were a specialized micro loan program, entrepreneurship education and training, and financial education and credit counseling for consumers and small business owners and entrepreneurs.

Please refer to the Demographic Information for the state of Mississippi in Table A below for detailed demographics and other performance context information for the Mississippi Non-MSA.

Mississippi Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Mississippi Non-MSA 2017- 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	2.3	14.0	55.8	27.9	0.0
Population by Geography	194,754	2.7	10.7	56.3	30.2	0.0
Housing Units by Geography	86,116	2.5	10.6	57.6	29.3	0.0
Owner-Occupied Units by Geography	47,080	1.4	8.6	57.2	32.8	0.0
Occupied Rental Units by Geography	26,142	4.2	14.8	56.7	24.3	0.0
Vacant Units by Geography	12,894	2.9	9.3	60.9	26.9	0.0
Businesses by Geography	10,083	3.4	12.3	56.9	27.4	0.0
Farms by Geography	396	0.5	5.8	58.6	35.1	0.0
Family Distribution by Income Level	47,755	22.5	14.8	17.1	45.6	0.0
Household Distribution by Income Level	73,222	25.8	14.6	14.9	44.7	0.0
Median Family Income Non- MSAs - MS		\$43,702	Median Housing Value			\$108,415
			Median Gross Rent			\$680
			Families Below Poverty Level			19.1%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area
Assessment Area: Mississippi Non-MSA 2015 - 2016

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	2.3	20.9	44.2	32.6	0.0
Population by Geography	194,749	1.8	15.8	48.8	33.5	0.0
Housing Units by Geography	84,776	1.9	15.9	49.0	33.2	0.0
Owner-Occupied Units by Geography	49,694	1.3	13.0	48.4	37.3	0.0
Occupied Rental Units by Geography	24,485	2.9	20.8	49.9	26.4	0.0
Vacant Units by Geography	10,597	2.1	18.3	49.5	30.1	0.0
Businesses by Geography	10,470	1.8	22.1	43.6	32.5	0.0
Farms by Geography	415	0.2	13.5	46.7	39.5	0.0
Family Distribution by Income Level	49,492	21.9	15.4	17.1	45.7	0.0
Household Distribution by Income Level	74,179	26.2	13.9	14.8	45.1	0.0
Median Family Income Non-MSAs - MS		\$40,980	Median Housing Value			\$96,687
			Median Gross Rent			\$587
			Families Below Poverty Level			17.5%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

() The NA category consists of geographies that have not been assigned an income classification.*

Scope of Evaluation in Mississippi

For the state of Mississippi, we completed a full-scope review for the Mississippi Non-MSA. Of the loans originated in Mississippi from 2015 through 2018, 63.7 percent were home mortgage loans. Mortgage loan volume accounted for 75.1 percent of all home mortgage and small business loan originations. Thus, we gave the most weight in our ratings to mortgage loan performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSISSIPPI

LENDING TEST

Performance under the Lending Test in Mississippi is rated Low Satisfactory.

Conclusions for Area Receiving a Full-scope Review

Based on a full-scope review, performance in the Mississippi Non-MSA is adequate.

Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of its AAs, when considering the capacity to make loans, product offerings, and competition in its respective AAs.

Number of Loans* 2015 through 2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Mississippi Non-MSA	835	442	26	6	1,309	100.0%	100.0%

Dollar Volume of Loans* 2015 through 2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Mississippi Non-MSA	\$125,762	\$41,695	\$855	\$6,046	\$174,358	100.0%	100.0%

Mississippi Non-MSA

Cadence's lending activity in the Mississippi Non-MSA is adequate. According to the June 30, 2017 FDIC Deposit Market Share Report, Cadence had a deposit market share of 19.3 percent. The deposit market share ranks first out of 16 depository financial institutions, which ranks in the top 1 percent of all bank's in the AA.

According to 2017 peer mortgage data, Cadence had a 6.0 percent market share of home mortgage originations in the AA. Cadence's market share of home mortgage loans is significantly weaker than the deposit market share. Cadence ranked fourth out of 174 lenders, which ranked in the top 2.3 percent of

lenders providing home mortgage loans in the AA. The market share ranking is near its deposit market share ranking.

According to 2017 peer small business data, Cadence had a 4.8 percent market share of small business loan originations. The market share of small business loans is weaker than the deposit market share. Cadence ranked seventh out of 61 small business lenders, which ranked in the top 11.5 percent of all banks originating small business loans. The market share ranking is near its deposit market share ranking.

Distribution of Loans by Income Level of the Geography

Cadence exhibits adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of home mortgage loan originations and purchases.

Mississippi Non-MSA

The geographic distribution of home mortgage loans is adequate. The geographic distribution of loans is good, 2017 through 2018. The percentage of mortgage loans in low-income CTs exceeded the percentage of owner-occupied housing in the AA. The percentage of mortgage loans in moderate-income CTs was below the percentage of owner-occupied housing in the AA. The proportion of mortgage loans in low-income CTs exceeded the aggregate distribution of mortgage loans in those geographies. The proportion of mortgage loans in moderate-income CTs is near the aggregate distribution of loans in those geographies. Performance 2015 through 2016 was weaker than performance 2017 through 2018. The demographic and aggregate performance in LMI CTs was poor, 2015 through 2016. Performance 2015 through 2016 had a negative impact on the geographical distribution of home mortgage loan rating.

Small Loans to Businesses

Refer to Table Q in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of originations and purchases of small loans to businesses.

Mississippi Non-MSA

The geographic distribution of small loans to businesses is good, 2017 through 2018. The proportion of small loans to businesses in low-income CTs was well below the percentage of businesses in those geographies. The proportion of small loans to businesses in moderate-income CTs is somewhat near the percentage of businesses in those geographies. The proportion of small loans to businesses in low-income CTs is near the aggregate distribution of small loans to businesses in those geographies. The proportion of small loans to businesses in moderate-income CTs exceeded the aggregate distribution of small loans to businesses in those geographies. Performance 2015 through 2016 was weaker than its performance 2017 through 2018. Weaker performance was due to very poor demographic and aggregate performance in low-income CTs. Performance 2015 through 2016 had a neutral impact on the rating.

Lending Gap Analysis

We reviewed lending summary reports and other supervisory data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

Cadence exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered.

Home Mortgage Loans

Refer to Table P in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of home mortgage loan originations and purchases.

Mississippi Non-MSA

Cadence exhibits a good distribution of home mortgage loans among individuals of different income levels, 2017 through 2018. The proportion of mortgage loans to low-income borrowers was significantly below the percentage of low-income families. The proportion of mortgage loans to moderate-income borrowers was near the percentage of moderate-income families. Performance was below the aggregate distribution of mortgage loans to low-income families. Performance exceeded the aggregate distribution of mortgage loans to moderate-income families. Performance 2015 through 2016 was consistent with its performance 2017 through 2018.

Small Loans to Businesses

Refer to Table R in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of origination and purchase of small loans to businesses.

Mississippi Non-MSA

Cadence exhibits a good distribution of loans among business of different sizes. The proportion of small loans to businesses (with revenue <\$1 million) was below the percentage of those businesses. The proportion of small loans to businesses exceeded the aggregate distribution of small loans to businesses. Performance in 2015 through 2016 was consistent with performance 2017 through 2018.

Community Development Lending

Cadence made an adequate level of CD loans. CD lending had a neutral impact on the Lending Test rating in Mississippi.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Mississippi Non-MSA

Cadence made an adequate level of CD loans in the Mississippi Non-MSA. Cadence originated six CD loans totaling \$6.0 million. Qualified CD lending was equal to 6.9 percent of allocated tier 1 capital. CD loans were not always responsive to identified community needs. CD lending focused on community service. There were no innovative or complex CD loans. CD lending had a neutral impact on the Lending Test rating.

- Cadence made one CD loan for \$1.5 million to a local water association in a middle-income underserved/distressed area. The project received a grant from the USDA Rural Housing

Administration. The purpose of the loan is to finance the building of water supply infrastructure. This loan will help provide a needed community service.

Product Innovation and Flexibility

Cadence makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Cadence made 22 CAHLP loans totaling \$2.3 million in the Mississippi Non-MSA.

INVESTMENT TEST

Performance under the Investment Test in Mississippi is rated High Satisfactory

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, performance in the Mississippi Non-MSA is good.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Mississippi Non-MSA	2	\$1,992	7	\$6,666	9	90.0%	\$8,658	67.2%	0	\$0
Mississippi Statewide	1	\$879	1	\$3,342	2	10.0%	\$4,221	32.8%	1	\$77

* Prior Period Investments are investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments are legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Mississippi Non-MSA

Based on identified opportunities, the level of CD investments in this AA is good. Cadence has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

Qualified investments in the Mississippi non-MSA during the assessment period totaled \$8.7 million, consisting of equity investments and donations. During the evaluation period, the outstanding prior period investments were approximately \$2.0 million. Investments made in the prior period continue to have a positive impact on the AA. The qualified CD investments equaled 8.3 percent of allocated tier 1 capital.

Of the \$8.6 million in qualified CD investments, \$62,000 consists of qualified grants and donations to CD organizations. Cadence invested in one MBS totaling \$138,000. These investments benefitted affordable housing needs in the AA. Additionally, Cadence invested \$5.5 million in five municipal bonds. These CD investments promoted economic development in the AA. Cadence exhibited good responsiveness to the identified community needs of the AA. Cadence makes rare use of innovative and complex qualified investments in this AA.

SERVICE TEST

Performance under the Service Test in Mississippi is rated Low Satisfactory

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, performance in the Mississippi Non-MSA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Mississippi Non-MSA	100.0	11	100.0	0.0	18.2	63.6	18.2	2.7	10.7	56.3	30.2

*2015 ACS Census, N/A CTs not listed, may not total 100.0

Mississippi Non-MSA

Delivery systems are reasonably accessible to geographies and individuals of different income levels in the Mississippi Non-MSA. Overall, there are 10 full-service branches in the AA. Cadence has no branches in low-income CTs and two branches located in moderate-income CTs. Cadence has six branches that are located in underserved middle-income CT, which significantly benefits the overall banking accessibility within the AA. The percentage of branches in middle income CTs exceed the population of the middle income CTs. The percentage of branch offices located in low-income CTs is significantly lower than the percentage of the population within the low-income CTs. The percentage of branch offices located in moderate-income CTs exceeds the percentage of the population within the moderate-income CTs.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Mississippi Non-MSA	0	3	0	-1	-1	-1

To the extent changes have been made, opening and closing of branches adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals given the performance context. The bank closed three branch locations within the Mississippi Non-MSA during the evaluation period. One branch was located in an upper-income CT, one in an underserved middle-income CT, and one in a moderate-income CT. This decreased the number of branches available to provide banking services to LMI customers and customers located in underserved areas within the AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the MSA, particularly LMI CTs or LMI individuals. Services offered, and hours of operation are comparable among locations regardless of the income level of the CT that each branch is located in.

Community Development Services

The bank provides a poor level of CD services.

Mississippi Non-MSA

Performance in providing CD services in the Mississippi Non-MSA is poor. During the evaluation period, 35 employees provided expertise to 29 different CD organizations for a total of 607 service hours. This represents poor responsiveness to the needs of the community. CD services in this area focused on providing financial literacy to LMI individuals. Some of these services included participating on the board of directors for community organizations that provided services to the local community.

State Rating

State of Tennessee

CRA rating for the state of Tennessee:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Needs to Improve

The major factors that support this rating include:

- Excellent borrower distribution and good geographic distribution of loans. Low-level of CD loans that were not responsive to identified community needs.
- Significant level of CD investments. CD investments were responsive to the identified community needs.
- Branch delivery systems are unreasonably inaccessible to all portions of the Memphis MSA. No branches in LMI CTs.

Description of Institution's Operations in Tennessee

As of December 31, 2018, Cadence had one AA within the State of Tennessee. This AA was comprised of the entirety of Shelby County which resides in the Memphis TN-MS-AR MSA, referred hereafter as the Memphis MSA.

Cadence offers a full range of loan and deposit products and services through four full service branches within Tennessee. The branches represent 6.1 percent of the total branch network. Cadence has four ATMs situated throughout the state, one of which is deposit-taking. During the evaluation period, 1.6 percent of deposits and 1.6 percent of loans were from Tennessee. As of June 30, 2018, Cadence held deposits totaling \$148 million in Tennessee, which represented a 0.1 percent market share and ranked number 121 out of 189 institutions with operations in Tennessee. The state's largest depository institutions are First Tennessee Bank, NA, Regions Bank, SunTrust Bank, Pinnacle Bank, and Bank of America, NA who held a combined 51.8 percent market share.

Memphis MSA

Substantial competition exists for financial services within the Memphis MSA. Based on the June 30, 2018, FDIC Deposit Market Share Report, Cadence ranked 23 out of 56 depository financial institutions in the AA, with a 0.6 percent market share. Competition includes large regional banks along with several institutions with a nationwide presence. The top four competitors accounted for 68.3 percent of the deposit market share within the Memphis MSA.

To help identify needs and opportunities in the Memphis MSA, the OCC utilized a regulatory agency contact that provides management and technical expertise through counseling and training seminars to a network of 20 locations across the state of Tennessee. Identified community credit needs are funds to assist with training and access to lines of credit to small business owners to meet short-term credit needs. The contact specified that all of the banks are generally meeting the service and credit needs of the community.

Please refer to the Demographic Information for the state of Tennessee in Table A below for detailed demographics and other performance context information for AAs that received full-scope reviews.

Memphis MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Memphis MSA 2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	221	29.0	22.2	14.5	31.7	2.7
Population by Geography	937,750	21.7	22.3	15.0	40.3	0.7
Housing Units by Geography	401,715	24.2	21.9	15.0	38.5	0.4
Owner-Occupied Units by Geography	199,014	13.8	18.8	15.9	51.4	0.2
Occupied Rental Units by Geography	148,210	32.0	25.1	14.6	28.0	0.3
Vacant Units by Geography	54,491	41.0	25.1	12.7	20.0	1.2
Businesses by Geography	52,970	15.0	17.8	16.4	49.5	1.3
Farms by Geography	1,093	10.5	15.1	15.4	57.9	1.1
Family Distribution by Income Level	220,451	26.3	15.3	16.2	42.2	0.0
Household Distribution by Income Level	347,224	27.0	15.6	15.8	41.6	0.0
Median Family Income MSA - 32820 Memphis, TN-MS-AR MSA		\$58,186	Median Housing Value			\$134,639
			Median Gross Rent			\$869
			Families Below Poverty Level			16.7%
Source: 2015 ACS Census and 2018 D&B Data						
Due to rounding, totals may not equal 100.0						
(*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area**Assessment Area: Memphis MSA 2015 - 2016**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	221	24.0	23.5	20.8	29.4	2.3
Population by Geography	927,644	16.4	23.3	22.1	37.8	0.5
Housing Units by Geography	396,303	18.8	23.9	22.3	35.0	0.0
Owner-Occupied Units by Geography	210,032	10.3	19.2	22.8	47.7	0.0
Occupied Rental Units by Geography	130,411	26.9	28.8	23.1	21.2	0.0
Vacant Units by Geography	55,860	31.9	30.1	18.4	19.6	0.0
Businesses by Geography	50,410	11.0	19.6	21.5	46.9	1.0
Farms by Geography	995	8.0	14.4	20.6	56.4	0.6
Family Distribution by Income Level	223,039	25.2	16.1	16.5	42.2	0.0
Household Distribution by Income Level	340,443	25.5	16.1	16.7	41.7	0.0
Median Family Income MSA - 32820 Memphis, TN-MS-AR MSA		\$56,100	Median Housing Value			\$139,954
			Median Gross Rent			\$782
			Families Below Poverty Level			15.4%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

() The NA category consists of geographies that have not been assigned an income classification.*

Scope of Evaluation in Tennessee

We completed a full-scope review of the Memphis MSA, the only AA in the state of Tennessee. Small business lending represented 67.4 percent of total loans originated in the Memphis MSA and home mortgage lending made up 32.6 percent.

In the 2015 through 2016 evaluation period, Cadence originated seven home mortgage loans in the Memphis MSA. A meaningful analysis cannot be derived from the limited number of home mortgage loans originated in the MSA during the 2015 through 2016 evaluation period and as such were not given as much weight in the state's overall rating.

In drawing our conclusions of performance in the state of Tennessee, we considered information from one community contact in the Memphis MSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

Performance under the Lending Test in Tennessee is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review performance in the Memphis MSA is good.

Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of its AAs, when considering the capacity to make loans, product offerings, and competition in its respective AAs.

Number of Loans* 2015 Through 2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Memphis MSA	57	118	0	2	177	99.9%	100.0%
Statewide	N/A	N/A	N/A	2	2	0.1	N/A

* The tables present the data for all Tennessee AAs and statewide CD loans. The narrative addresses performance in full-scope areas only.

Dollar Volume of Loans* 2015 through 2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Memphis MSA	\$8,261	\$15,823	\$0	\$1,200	\$25,284	92.7%	100.0%
Statewide	N/A	N/A	N/A	\$2,000	\$2,000	7.3%	N/A

* The tables present the data for all Tennessee AAs and statewide CD loans. The narrative addresses performance in full-scope areas only.

Cadence's lending activity in the Memphis MSA exhibits adequate responsiveness to the credit needs of the AA. According to the June 30, 2018, FDIC Deposit Market Share Report, Cadence had a deposit market share of 0.6 percent. The deposit market share ranked 23 out of 56 deposit financial institutions, which ranked in the top 41.1 percent of all banks in the AA.

According to 2017 peer mortgage data, Cadence had a 0.01 percent market share of home mortgage loan originations in the AA. The market share is weaker than the deposit market share. Cadence ranked 253 out of 426 lenders, which ranked in the top 59.4 percent of lenders providing home mortgage loans in the AA. The home mortgage market share ranking is below the deposit market share ranking.

According to 2017 peer small business data, Cadence had a 0.1 percent market share of small business loan originations. The market share of small business loan originations is weaker than the deposit market share. Cadence ranked 46 out of 113 small business lenders, which ranked in the top 40.7 percent of all banks originating small business loans. The market share ranking of small business loan originations is stronger than the deposit market share ranking.

Distribution of Loans by Income Level of the Geography

Cadence exhibits good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Tennessee section of appendix D for the facts and data used to evaluate the geographic distribution of home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is adequate. The proportion of home mortgage loans in low-income CTs exceeded the percentage of owner-occupied housing in those geographies. The percentage of home mortgage loans in moderate-income CTs was well below the percentage of owner-occupied housing in those geographies. The proportion of mortgage loans in low-income CTs exceeds the aggregate distribution of mortgage loans in those geographies. The proportion of mortgage loans in moderate-income CTs is well below the aggregate distribution of loans in those geographies.

Small Loans to Businesses

Refer to Table Q in the state of Tennessee section of appendix D for the facts and data used to evaluate the geographic distribution of originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent, 2017 through 2018. The proportion of small loans to businesses in LMI CTs exceeded the percentage of businesses in those geographies. The proportion of small loans to businesses exceeded the aggregate distribution of small loans to businesses in LMI geographies. Performance 2015 through 2016 was weaker than performance 2017 through 2018. Weaker performance was due to weaker aggregate and demographic performance in low-income geographies. Weaker performance had a neutral impact on performance in the AA.

Lending Gap Analysis

We reviewed lending summary reports and other supervisory data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

Cadence exhibits excellent distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered.

Home Mortgage Loans

Refer to Table P in the state of Tennessee section of appendix D for the facts and data used to evaluate the borrower distribution of home mortgage loan originations and purchases.

Cadence exhibits excellent distribution of home mortgage loans among individuals of different income levels. The proportion of home mortgage loans to LMI borrowers exceeded the percentage of LMI families in the AA. The proportion of home mortgage loans to LMI borrowers exceeded the aggregate distribution of home mortgage loans to LMI families.

Small Loans to Businesses

Refer to Table R in the state of Tennessee section of appendix D for the facts and data used to evaluate the borrower distribution of origination and purchase of small loans to businesses.

Cadence exhibits an excellent distribution of loans among business of different sizes. The proportion of small loans to businesses (with revenue <\$1 million) is near the percentage of those businesses. The proportion of small loans to businesses exceeded the aggregate distribution of small loans to businesses. The bank's performance in 2015 through 2016 was consistent with its performance 2017 through 2018.

Community Development Lending

Cadence made a low-level of CD loans. CD lending performance had a neutral impact on the Lending Test rating in Tennessee.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Cadence made two CD loans in the Memphis MSA that totaled \$1.2 million. CD lending volume was equal to 5.8 percent of allocated tier 1 capital. CD loans were not responsive to identified community needs. CD loans were not innovative/complex or demonstrated leadership. Cadence made one loan for the identified community need of economic development.

- Cadence made one loan for \$200,000 to a CDFI to support economic development in the AA.

Product Innovation and Flexibility

Cadence makes little use of innovative or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

Cadence's performance under the Investment Test in Tennessee is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Memphis MSA is good.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Memphis MSA	1	\$385	5	\$1,582	6	66.7%	\$1,967	68.0%	1	\$1,676
Statewide	2	\$193	1	\$731	3	33.3%	\$924	32.0%	1	\$384

* Prior Period Investments are investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments are legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Based on these identified opportunities, the level of CD investments in this AA is good. Cadence has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

Qualified CD investments in the Memphis MSA during the assessment period totaled \$2.0 million, consisting of equity investments, cash, and in-kind donations. During the evaluation period, there was one outstanding prior period investment. Total CD investments equaled 9.4 percent of allocated tier 1 capital.

Of the \$2.0 million in qualified CD investments, \$5,000 consists of qualified grants and donations to CD organizations. Cadence made four investments in MBS totaling approximately \$1.3 million. These investments benefitted affordable housing needs in the AA. Cadence also invested \$324,000 in a SBIC to promote economic development needs in the AA. Cadence exhibited adequate responsiveness to the identified community needs. Cadence made rare use of innovative and complex qualified investments in the Memphis MSA.

Tennessee Statewide

Cadence made one investment in the broader statewide region for \$731,000. This investment was directed at economic development. The investment was made to a SBIC serving the broader regional Tennessee area.

SERVICE TEST

Cadence performance under the Service Test in Tennessee is rated Needs Improvement.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, Cadence performance in the Memphis MSA is poor.

Retail Banking Services

Service delivery systems are unreasonably inaccessible to portions of the AA, particularly to LMI geographies and individuals.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Memphis MSA	100.0	4	100.0	0.0	0.0	0.0	100.0	21.7	22.3	15.0	40.3

*2015 ACS Census, N/A CTs not listed, may not total 100.0

Cadence's branch delivery systems are unreasonably inaccessible to portions of the Memphis MSA. Overall, there are four full-service branches in the MSA. Cadence has no branches in LMI CTs. The

percentage of branches in LMI CTs is significantly lower than the percentage of the population within those geographies.

Cadence did not open or close any branches during the evaluation period in the Memphis MSA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the MSA, particularly LMI CTs or LMI individuals. Services offered, and hours of operation are comparable among locations regardless of the income level of the CT.

Community Development Services

The institution provides an adequate level of CD services.

Performance in providing CD services in the Memphis MSA is adequate. Throughout the evaluation period, 16 employees provided their expertise to 12 different CD organizations for a total of 780 service hours. This represents an adequate responsiveness to the needs of the community. CD services in this area focused on providing financial literacy to LMI individuals. Some of these services included participating on the board of directors for community organizations that provided services to the local community.

State Rating

State of Texas

CRA rating for the state of Texas:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Excellent performance of borrower and geographic distribution of home mortgage loans 2017 through 2018 was offset by significantly weaker performance 2015 through 2016.
- Good borrower and geographic distribution of small loans to businesses.
- A good level of CD loans that was responsive to identified community needs. Cadence makes extensive use of innovative and flexible home mortgage loan products.
- An excellent level of CD investments throughout the state of Texas. CD investments were responsive to community needs in the full-scope AA.
- Branch delivery systems are unreasonably inaccessible to all portions of the geographies in Texas. Cadence improved branch access in moderate-income CT. Cadence provides a good level of CD services in the Houston MSA.

Description of Institution's Operations in Texas

As of December 31, 2018, Cadence had two AAs within the state of Texas. These AAs include the Houston-Woodlands-Sugar Land MSA (Houston MSA) comprised of Fort Bend, Harris, and Montgomery counties and the San Antonio-New Braunfels MSA (San Antonio MSA) comprised of Bexar County.

Cadence offers a full range of loan and deposit products and services through 12 full service branches within Texas. The branches represent 18.2 percent of the total branch network. Cadence has a total of 10 ATMs within the state, nine of which are deposit-taking. During the evaluation period, 44.1 percent of bank-wide deposits and 43.1 percent of loans were from Texas. As of June 30, 2018, Cadence held deposits totaling \$4.2 billion in Texas, which represented a 0.5 percent market share and ranked number 23 out of 523 institutions with operations in Texas. The state's largest depository institutions are JPMorgan Chase, NA, Bank of America, NA, USAA Federal Savings Bank, and Wells Fargo, NA who held a combined 53.2 percent market share. The most significant AA in Texas, in terms of lending and deposits, is the Houston MSA, which accounted for 97.4 percent of deposits and 92.1 percent of loans.

Houston MSA

Competition for financial services in the Houston MSA is highly competitive. Based on the June 30, 2018 FDIC Deposit Market Share Report, Cadence ranked 12th of 82 depository financial institutions in the AA, with a 1.8 percent market share and \$4.1 billion in deposits. Competition includes large regional banks along with several institutions with a nationwide presence. The top four competitors accounted for 69.5 percent of the deposit market share within the Houston MSA.

To help identify needs and opportunities in the Houston TX MSA, the OCC utilized a regulatory agency contact with a small business technical assistant provider. The community contact indicated that there are numerous opportunities for small business loans in the Houston market area, especially those businesses impacted by Hurricane Harvey. The contact pointed out that banks that are SBA lenders are willing to lend to Small Business Development Center (SBDC) clients and that financial institutions that partner with SBDCs have been helpful and continue to work with SBDCs to originate loans to small businesses.

To further our understanding of the Houston MSA's community credit needs, the OCC's Community Affairs Officer participated in an Interagency CRA & Disaster Recovery Listening Session focused on lessons learned after Hurricane Harvey. Over 150 people attended, representing nonprofits, affordable housing groups, Community Development Financial Institutions (CDFIs), federal, state, & local government; real estate agents, and legal aid. The participants identified the need for grants and small dollar loans to help revitalize and stabilize disaster impacted communities, investments and services to CDFIs to help fund small businesses, and increased member bank participation in Federal Home Loan Bank AHP and disaster recovery programs. They also indicated that there are opportunities for financial institutions to provide financial literacy programs, foreclosure assistance, and assistance with developing programs to help nonprofits become developers and build capacity.

Please refer to the Demographic Information for the state of Texas in Table A below for detailed demographics and other performance context information for AAs that received full-scope reviews.

Houston MSA**Table A – Demographic Information of the Assessment Area****Assessment Area: Houston TX MSA 2017 - 2018**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	921	16.4	29.5	23.0	30.3	0.8
Population by Geography	5,517,279	12.9	27.1	26.0	33.8	0.3
Housing Units by Geography	2,067,422	13.6	26.0	25.1	35.0	0.3
Owner-Occupied Units by Geography	1,110,317	5.8	22.1	27.4	44.6	0.1
Occupied Rental Units by Geography	768,637	22.6	30.8	23.0	23.0	0.6
Vacant Units by Geography	188,468	22.9	29.3	20.3	27.2	0.3
Businesses by Geography	428,232	10.6	19.3	22.3	47.6	0.2
Farms by Geography	6,471	6.3	17.2	26.5	49.8	0.1
Family Distribution by Income Level	1,323,623	25.1	16.2	16.9	41.9	0.0
Household Distribution by Income Level	1,878,954	25.1	16.1	16.8	42.0	0.0
Median Family Income MSA - 26420 Houston-The Woodlands- Sugar Land, TX MSA		\$69,373	Median Housing Value			\$177,463
			Median Gross Rent			\$979
			Families Below Poverty Level			13.3%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area**Assessment Area: Houston TX MSA 2015 - 2016**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	921	13.2	29.1	25.1	32.1	0.4
Population by Geography	5,133,580	10.2	26.9	27.7	34.8	0.3
Housing Units by Geography	1,902,390	11.5	26.6	26.7	35.2	0.0
Owner-Occupied Units by Geography	1,042,677	4.4	21.6	29.0	45.0	0.0
Occupied Rental Units by Geography	647,652	20.3	32.9	23.9	22.9	0.0
Vacant Units by Geography	212,061	19.9	31.8	23.6	24.7	0.0
Businesses by Geography	399,082	8.5	19.4	24.4	47.7	0.1
Farms by Geography	6,310	5.2	17.2	30.0	47.7	0.0
Family Distribution by Income Level	1,197,030	24.3	16.6	17.4	41.7	0.0
Household Distribution by Income Level	1,690,329	24.4	16.6	16.9	42.1	0.0
Median Family Income MSA - 26420 Houston-The Woodlands- Sugar Land, TX MSA		\$63,898	Median Housing Value			\$159,136
			Median Gross Rent			\$857
			Families Below Poverty Level			12.2%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

() The NA category consists of geographies that have not been assigned an income classification.*

Scope of Evaluation in Texas

For the state of Texas, we completed a full-scope review for the Houston MSA, and a limited-scope review for the San Antonio MSA. Cadence's performance in the Houston MSA is weighted most heavily in arriving at the overall conclusion for the state as it provides the largest share of loans and deposits. Of the loans that were originated in a Texas AA, 92.1 percent were originated or purchased in the Houston MSA and 7.9 percent were in the San Antonio MSA. According to the June 30, 2018 FDIC Deposit Market Share Report, deposits in Texas, 97.4 percent were in the Houston MSA and 2.6 percent were in the San Antonio MSA. The Houston MSA also has the most branch offices within the state.

In the 2015 through 2016 and 2017 through 2018 evaluation periods, Cadence originated 17 and 12 small business loans, respectively, in the San Antonio MSA. A meaningful analysis cannot be derived from the limited number of small business loans originated in the San Antonio MSA during the 2015 through 2016 and 2017 through 2018 evaluation periods and as such were given minimal consideration in the state's overall rating. The Texas state rating is based primarily on the results of the areas that received full-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

Cadence performance under the Lending Test in Texas is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, performance in the Houston MSA is good.

Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of its AAs, when considering the capacity to make loans, product offerings, and competition in its respective AAs.

Number of Loans* 2015 through 2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Houston MSA	3,622	785	6	13	4,426	92.1%	97.4%
San Antonio MSA	349	28	0	4	381	7.9%	2.6%
Statewide	N/A	N/A	N/A	1	1	0.0%	N/A

* The tables present the data for all Texas AAs and statewide CD loans. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* 2015 through 2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State * Loans	%State Deposits
Houston MSA	\$1,121,032	\$207,498	\$1,500	\$71,694	\$1,401,724	92.7%	97.4%
San Antonio MSA	\$73,731	\$15,440	\$0	\$7,398	\$96,569	6.4%	2.6%
Statewide	N/A	N/A	N/A	\$15,000	\$15,000	0.9	N/A

* The tables present the data for all Texas AAs and statewide CD loans. The narrative below addresses performance in full-scope areas only.

Houston MSA

Cadence lending activity in the Houston MSA is adequate. According to the June 30, 2018 FDIC Deposit Market Share Report. Cadence had a deposit market share of 1.8 percent in the AA. Cadence's deposit market share ranked 12 out of 82 depository financial institutions, which ranked in the top 14.6 percent of all deposit-taking institutions in the AA.

According to 2017 peer mortgage data, Cadence had a 0.4 percent market share of home mortgage loan originations in the AA. The market share of home mortgages is weaker than its deposit market share. Cadence ranked 62 out of 835 lenders in home mortgage originations, which ranked in the top 7.4 percent of lenders providing home mortgage loans in the AA. Cadence's home mortgage market share ranking is stronger than the deposit market share ranking.

According to 2017 peer small business data, Cadence had a 0.2 percent market share of small business loan originations. The market share of small business loan originations is below its deposit market share. Cadence ranked 44 out of 213 small business lenders, which ranked in the top 20.7 percent of all banks

originating small business loans. Cadence's small business loan origination market share ranking was below the deposit market share ranking.

Distribution of Loans by Income Level of the Geography

Cadence exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of home mortgage loan originations and purchases.

Houston MSA

The overall geographic distribution of home mortgage loans is good. The geographic distribution of home mortgage loans is excellent, 2017 through 2018. The proportion of home mortgage loans in LMI CTs exceeded the percentage of owner-occupied housing in those geographies. The proportion of home mortgage loans in LMI CTs exceeded the aggregate distribution of home mortgage loans in those geographies. Cadence's performance 2015 through 2016 was weaker than its performance in 2017 through 2018. Weaker performance was due to the fact that the percentage of loans in LMI CTs was below the percentage of owner-occupied housing in those geographies. Weaker performance had a negative impact on the geographical distribution rating in the Houston MSA.

Small Loans to Businesses

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of originations and purchases of small loans to businesses.

Houston MSA

The geographic distribution of small loans to businesses is good, 2017 through 2018. The proportion of small loans to businesses in low-income CTs exceeded the percentage of businesses in those geographies. The proportion of small loans to businesses in moderate-income CTs was below the percentage of businesses in those geographies. The proportion of small loans to businesses exceeded the aggregate distribution of small loans to businesses in low-income geographies. The proportion of small loans to businesses was below the aggregate distribution of small loans to businesses in moderate CT geographies. Performance 2015 through 2016 was consistent with performance 2017 through 2018.

Lending Gap Analysis

We reviewed lending summary reports and other supervisory data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

Cadence exhibits adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of home mortgage loan originations and purchases.

Houston MSA

Cadence exhibits an overall adequate distribution of home mortgage loans among individuals of different income levels. Cadence exhibits an excellent distribution of home mortgage loans among individuals of different income levels, 2017 through 2018. The proportion of home mortgage loans to low-income borrowers is well below the percentage of low-income families in the AA. Cadence's proportion of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. The proportion of home mortgage loans to LMI borrowers exceeded the aggregate distribution of home mortgage loans to LMI families. Performance providing home mortgage loans to borrowers of different income levels in 2015 through 2016 was weaker than its performance 2017 through 2018. The proportion of home mortgage loans to LMI borrowers was significantly below the percentage of LMI families and aggregate distribution of home mortgage loans to LMI borrowers in the AA. Performance in the Houston MSA, 2015 through 2016, had a significantly negative impact on the borrower distribution rating in the Houston MSA.

Small Loans to Businesses

Refer to Table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of origination and purchase of small loans to businesses.

Houston MSA

Cadence exhibits a good distribution of loans among business of different sizes. The proportion of small loans to businesses (with revenue <\$1 million) was well below the percentage of those businesses. The proportion of small loans to businesses exceeded the aggregate distribution of small loans to businesses. Performance in providing small loans to businesses in 2015 through 2016 was consistent with its performance 2017 through 2018.

Community Development Lending

Cadence made a good level of CD loans that were responsive to community needs. CD lending had a positive impact on the Lending Test rating in Texas.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Houston MSA

Cadence made a relatively high level of CD loans in the AA. Cadence made 13 CD loans totaling \$71.7 million. The CD loan volume is equal to 12.6 percent of tier 1 capital allocated to the AA. CD loans were responsive to identified community needs. CD loan volume focused on affordable housing, economic development, and community service.

- Cadence made a loan for \$29 million to promote economic development in the AA. The CD loan was made to develop a retail shopping center located in a low-income CT. In addition to providing

permanent jobs to the CT, this retail establishment will also provide grocery and pharmacy options for local residents.

- Cadence made a loan for \$4.2 million to support affordable housing. The loan is for the construction of an 85-unit affordable housing project.

Product Innovation and Flexibility

Cadence makes extensive use of flexible lending practices to serve AA credit needs. Cadence made 276 CAHLP loans totaling \$58.7 million in the Houston MSA. These loans are a flexible affordable home loan program that benefit LMI individuals.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, performance under the Lending Test in the San Antonio MSA is consistent with the overall performance under the Lending Test in the full-scope area.

INVESTMENT TEST

Performance under the Investment Test in Texas is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, performance in the Houston MSA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Houston MSA	6	\$2,993	23	\$57,111	29	65.9%	\$60,104	89.5%	7	\$5,006
San Antonio MSA	0	\$0	4	\$1,853	4	9.1%	\$1,853	2.8%	1	\$1,950
Statewide	4	\$952	8	\$4,263	12	25.0%	\$5,215	7.8%	8	\$5,980

* Prior Period Investments are investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments are legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Houston MSA

Based on the identified opportunities in the AA, the level of CD investments is excellent. Cadence has an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

Qualified investments in the Houston MSA during the assessment period totaled \$60.1 million, consisting of equity investments and donations. During the evaluation period, the outstanding prior period investments were approximately \$3.0 million. Investments made in prior periods continue to have a positive impact on the AA. Total CD investments equaled 10.5 percent of allocated tier 1 capital.

Qualified grants and donations to CD organizations totaled \$333,000. CD investments in the AA focused on affordable housing. Cadence purchased \$34.4 million in CRA-qualified MBSs, made one \$3.9 million investment in a Low-Income Housing Tax Credit, and invested \$2.5 million in other CRA qualified funds. Cadence made CD investments of \$4.9 million in SBICs to promote economic development. Cadence exhibited occasional use of complex qualified investments in the AA.

Statewide

Cadence has \$5.2 million of qualified CD investments in the broader statewide area. Statewide CD investments consist primarily of investments in SBICs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, performance under the Investment Test in the San Antonio MSA is consistent with the overall performance under the Investment Test in the full-scope area.

SERVICE TEST

Performance under the Service Test in Texas is rated Low Satisfactory

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review performance in the Houston MSA is adequate.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Houston MSA	97.4	11	91.7	0.0	9.1	18.2	72.7	12.9	27.1	26.0	33.8
San Antonio MSA	2.6	1	8.3	0.0	0.0	0.0	100.0	7.4	34.0	27.7	30.9

*2015 ACS Census, N/A CTs not listed, may not total 100.0

Houston MSA

Cadence's branch delivery systems are unreasonably inaccessible to all portions of the Houston MSA. Overall, there are 11 full-service branches in the MSA. Cadence has no branches in low-income CTs, and one branch located in a moderate-income CT. The percentage of branch offices located in low-income CTs is significantly lower than the percentage of the population within the low-income CTs. In addition to this, the percentage of branch offices that are located in moderate-income CTs is lower than the percentage of the population within the moderate-income CTs.

	Distribution of Branch Openings/Closings					
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Houston MSA	3	5	0	+1	0	-3

Houston MSA

To the extent changes have been made, the opening and closing of branches improved the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. Cadence opened three branch locations and closed five branch locations within the Houston MSA during the evaluation period. Two of the branches that opened were located in an upper-income CT and one was in a moderate-income CT. All five of the branches that closed were located in upper-income CTs. Overall, this increased the accessibility of the retail services to its LMI customers, particularly in moderate-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the population, particularly LMI individuals. Services offered, and hours of operation are comparable among locations, regardless of the income level of the CT that a branch is located.

Community Development Services

Cadence provides a relatively high level of CD services.

Cadence's performance in providing CD services in the Houston MSA is good. During the evaluation period, 127 employees provided expertise to 46 different CD organizations for a total of 2,831 service hours. This represents good responsiveness to the needs of the community. The CD services in this AA focused on education by providing financial literacy to LMI individuals. Some of these services included participating on the board of directors for community organizations that provided services to the local community. In addition to this, disaster relief was provided to help the local community to recover from hurricane damage.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, performance under the Service Test in the San Antonio MSA is consistent with the overall performance under the Service Test in the full-scope area.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope.”

Time Period Reviewed:	January 1, 2015 through December 31, 2018	
Bank Products Reviewed:	Home mortgage loans, small business loans, CD loans, CD investments, and CD services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Alabama		Counties Included in Cadence AA
Alabama Non-MSA	limited-scope	Covington, Marshall, Monroe, Perry, and Talladega
Birmingham-Hoover MSA	full-scope	Blount, Jefferson, and Shelby
Decatur MSA	limited-scope	Morgan
Gadsden MSA	limited-scope	Etowah
Huntsville MSA	full-scope	Madison
Montgomery MSA	limited-scope	Montgomery
Tuscaloosa MSA	full-scope	Tuscaloosa
Florida		
Homosassa Springs MSA	full-scope	Citrus
Northport-Bradenton-Sarasota MSA	limited-scope	Manatee and Sarasota
Ocala MSA	limited-scope	Marion
Tampa-St. Petersburg-Clearwater MSA	full-scope	Hernando, Hillsborough, Pasco, and Pinellas
Mississippi		
Mississippi Non-MSA	full-scope	Clay, Lowndes, Monroe, Neshoba, and Oktibbeha
Tennessee		
Memphis MSA	full-scope	Shelby
Texas		
Houston-The Woodlands-Sugarland MSA	full-scope	Fort Bend, Harris, and Montgomery
San Antonio MSA	limited-scope	Bexar

Appendix B: Summary of State Ratings

RATINGS Cadence Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
Cadence Bank, National Association	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State:				
Alabama	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Florida	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Mississippi	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Tennessee	High Satisfactory	High Satisfactory	Needs to Improve	Satisfactory
Texas	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals

the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment

center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - ALABAMA																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Alabama Non-MSA	53	5,514	4.4	4,800	0.6	0.0	0.2	13.3	30.2	11.6	54.9	58.5	49.9	31.2	11.3	38.3	0.0	0.0	0.0
Birmingham AL MSA	562	182,424	46.5	26,752	6.0	5.2	2.0	18.4	26.2	10.6	31.8	28.3	30.7	43.8	40.4	56.7	0.0	0.0	0.0
Decatur AL MSA	21	2,131	1.7	3,574	4.4	0.0	3.5	9.3	4.8	8.3	49.9	52.4	47.7	36.4	42.9	40.6	0.0	0.0	0.0
Gadsden AL MSA	13	1,284	1.1	2,176	4.0	0.0	1.9	19.7	0.0	10.9	43.5	69.2	38.0	32.9	30.8	49.2	0.0	0.0	0.0
Huntsville AL MSA	165	31,589	13.7	14,034	5.1	1.8	3.0	18.3	22.4	14.3	33.0	27.9	35.3	43.6	47.9	47.3	0.0	0.0	0.0
Montgomery AL MSA	61	10,829	5.1	5,073	10.3	0.0	3.1	25.2	14.8	15.8	26.8	29.5	26.3	37.6	55.7	54.6	0.1	0.0	0.2
Tuscaloosa AL MSA	333	81,902	27.6	5,980	1.2	0.0	0.3	12.8	14.1	9.2	46.9	39.6	44.1	38.5	44.4	45.3	0.5	1.8	1.1
Total	1,208	315,672	100.0	62,389	5.0	2.6	2.1	17.5	21.3	11.7	37.1	33.6	35.4	40.3	42.0	50.7	0.1	0.5	0.1
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - ALABAMA **2015-16**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Alabama Non-MSA	48	4,238	4.6	4,883	1.2	6.3	0.6	16.4	14.6	10.3	45.6	31.3	43.4	36.8	47.9	45.7	0.0	0.0	0.0
Birmingham AL MSA	337	67,676	32.3	29,850	5.3	1.8	1.1	15.0	9.8	6.5	37.3	32.9	32.7	42.4	55.5	59.7	0.0	0.0	0.0
Decatur AL MSA	18	1,564	1.7	3,565	1.7	0.0	0.4	13.5	11.1	12.6	50.4	61.1	48.2	34.4	27.8	38.8	0.0	0.0	0.0
Gadsden AL MSA	8	551	0.8	2,479	1.4	0.0	0.4	21.1	0.0	13.2	40.9	75.0	33.6	36.6	25.0	52.8	0.0	0.0	0.0
Huntsville AL MSA	209	42,289	20.0	14,830	4.2	2.9	2.0	16.2	20.1	11.4	37.5	35.9	39.7	42.0	41.1	46.9	0.0	0.0	0.0
Montgomery AL MSA	146	21,590	14.0	5,631	9.6	0.7	2.9	21.4	2.7	8.5	23.4	21.9	19.2	45.6	74.7	69.4	0.0	0.0	0.0
Tuscaloosa AL MSA	278	78,555	26.6	6,138	4.1	2.2	1.7	12.9	6.1	8.3	41.6	28.4	36.4	41.4	63.3	53.7	0.0	0.0	0.0
Total	1,044	216,463	100.0	67,376	4.5	2.1	1.4	16.1	10.1	8.7	38.3	31.5	35.1	41.1	56.3	54.8	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - ALABAMA																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Alabama Non-MSA	53	5,514	4.4	4,800	22.8	5.7	4.1	17.7	28.3	13.8	18.0	20.8	20.4	41.6	45.3	42.9	0.0	0.0	18.8
Birmingham AL MSA	562	182,424	46.5	26,752	23.2	8.9	5.2	15.3	20.6	16.1	18.1	6.4	19.1	43.4	26.3	39.9	0.0	37.7	19.7
Decatur AL MSA	21	2,131	4.7	3,574	20.9	23.8	8.2	17.0	47.6	19.2	19.7	9.5	20.4	42.4	19.0	30.5	0.0	0.0	21.7
Gadsden AL MSA	13	1,284	1.7	2,176	24.6	7.7	8.1	16.1	30.8	17.0	19.2	23.1	22.4	40.1	38.5	32.2	0.0	0.0	20.3
Huntsville AL MSA	165	31,589	13.7	14,034	22.9	20.0	12.7	16.0	28.5	17.8	17.4	17.0	18.7	43.8	33.3	30.4	0.0	1.2	20.5
Montgomery AL MSA	61	10,829	8.0	5,073	27.5	8.2	5.7	16.0	34.4	16.1	17.2	18.0	19.1	39.3	37.7	35.1	0.0	1.6	24.0
Tuscaloosa AL MSA	333	81,902	74.8	5,980	22.3	3.3	4.5	15.4	27.0	15.8	17.6	13.5	18.7	44.7	55.6	36.5	0.0	0.6	24.5
Total	1,208	315,672	100.0	62,389	23.4	8.9	7.0	15.9	25.1	16.5	18.0	11.3	19.2	42.7	36.8	36.5	0.0	18.0	20.8
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - ALABAMA **2015-16**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Alabama Non-MSA	48	4,238	4.6	4,883	22.8	6.3	4.4	16.8	18.8	13.8	18.2	18.8	19.6	42.2	52.1	42.0	0.0	4.2	20.3
Birmingham AL MSA	337	67,676	32.3	29,850	21.1	5.9	5.8	16.5	12.2	14.7	19.2	15.4	18.7	43.2	41.8	38.2	0.0	24.6	22.7
Decatur AL MSA	18	1,564	3.6	3,565	20.7	22.2	7.7	17.2	33.3	18.5	20.0	5.6	20.5	42.1	38.9	33.6	0.0	0.0	19.8
Gadsden AL MSA	8	327	1.6	2,479	19.9	25.0	6.2	18.3	12.5	16.4	19.7	12.5	20.2	42.1	50.0	35.7	0.0	0.0	21.5
Huntsville AL MSA	209	42,289	20.0	14,830	21.7	15.3	9.1	15.5	14.4	16.7	18.3	18.7	18.0	44.5	34.0	33.3	0.0	17.7	22.9
Montgomery AL MSA	146	21,590	14.0	5,631	26.4	10.3	7.2	16.2	24.0	15.5	16.9	24.7	17.5	40.6	39.7	31.3	0.0	1.4	28.4
Tuscaloosa AL MSA	278	78,555	26.6	6,138	19.8	1.4	3.4	16.1	8.3	14.6	19.8	13.7	17.7	44.2	74.1	34.6	0.0	2.5	29.7
Total	1,044	216,463	100.0	67,376	21.8	7.7	6.4	16.5	13.9	15.4	18.8	16.9	18.6	43.0	49.0	36.2	0.0	12.5	23.5

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - ALABAMA																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Alabama Non-MSA	62	4,667	9.1	2,339	0.5	0.0	0.1	19.1	40.3	18.7	50.7	33.9	49.5	29.7	25.8	31.7	0.0	0.0	0.0
Birmingham AL MSA	303	44,653	77.5	17,000	8.1	6.6	8.1	18.3	24.4	15.2	28.5	29.0	26.2	43.7	39.3	49.6	1.4	0.7	0.9
Decatur AL MSA	16	1,710	5.4	1,601	6.2	6.3	6.1	13.0	0.0	12.5	52.4	81.3	50.4	28.3	12.5	31.0	0.0	0.0	0.0
Gadsden AL MSA	29	3,691	7.4	1,052	4.6	3.4	4.3	21.0	10.3	17.1	48.3	48.3	45.5	26.0	37.9	33.1	0.0	0.0	0.0
Huntsville AL MSA	88	11,401	12.8	5,647	12.3	10.2	14.3	22.4	28.4	17.5	28.5	21.6	28.2	36.7	39.8	39.9	0.0	0.0	0.0
Montgomery AL MSA	46	11,439	15.6	3,608	9.8	6.5	9.5	22.5	10.9	18.8	28.6	23.9	24.8	33.6	58.7	41.9	5.6	0.0	5.0
Tuscaloosa AL MSA	141	23,277	48.0	2,953	1.5	0.7	1.3	26.9	21.3	25.9	42.4	56.0	44.2	26.2	20.6	27.3	2.9	1.4	1.3
Total	685	100,838	100.0	34,200	7.5	5.1	7.9	20.1	23.7	17.0	33.6	35.8	31.3	37.2	34.9	42.7	1.5	0.6	1.1
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - ALABAMA **2015-16**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Alabama Non-MSA	56	6,611	10.1	2,368	2.5	0.0	1.2	17.3	21.4	17.0	47.4	57.1	44.2	32.8	21.4	37.6	0.0	0.0	0.0
Birmingham AL MSA	231	46,541	41.6	18,175	9.1	12.1	7.8	16.4	12.6	12.9	30.4	26.8	26.4	44.1	48.5	53.0	0.0	0.0	0.0
Decatur AL MSA	10	1,528	1.8	1,676	1.3	0.0	1.2	22.6	20.0	21.4	49.1	60.0	45.8	26.9	20.0	31.6	0.0	0.0	0.0
Gadsden AL MSA	16	2,713	6.0	1,020	1.4	0.0	0.5	31.7	25.0	27.8	37.0	18.8	34.2	29.9	56.3	37.5	0.0	0.0	0.0
Huntsville AL MSA	73	11,784	13.2	7,087	12.1	26.0	12.0	21.4	9.6	14.5	30.1	13.7	28.2	36.4	50.7	45.4	0.0	0.0	0.0
Montgomery AL MSA	36	7,382	12.5	4,242	22.2	22.2	16.7	16.8	8.3	13.6	17.8	2.8	14.6	43.3	66.7	55.0	0.0	0.0	0.0
Tuscaloosa AL MSA	133	23,275	24.0	2,886	8.0	9.8	6.3	23.6	24.8	24.2	36.6	31.6	33.9	31.8	33.8	35.6	0.0	0.0	0.0
Total	555	99,834	100.0	37,454	9.7	12.3	8.6	18.9	16.2	15.2	32.3	28.1	28.2	39.2	43.4	48.1	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - ALABAMA											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Alabama Non-MSA	62	4,667	9.1	2,339	78.5	58.1	44.4	5.6	38.7	15.9	5.9
Birmingham AL MSA	303	44,653	44.2	17,000	80.3	62.4	46.9	7.3	35.3	12.5	2.3
Decatur AL MSA	16	1,710	3.1	1,601	77.9	62.5	49.4	7.0	37.5	15.1	0.0
Gadsden AL MSA	29	3,691	5.4	1,052	78.6	48.3	42.2	6.4	44.8	15.0	12.5
Huntsville AL MSA	88	11,401	12.8	5,647	81.4	65.9	51.2	6.1	26.1	12.5	8.0
Montgomery AL MSA	46	11,439	7.4	3,608	76.1	43.5	46.8	7.4	50.0	16.5	10.3
Tuscaloosa AL MSA	141	23,277	20.6	2,953	80.9	45.4	43.3	6.5	46.1	12.7	8.5
Total	685	100,838	100.0	34,200	79.7	57.1	47.1	6.8	38.1	13.5	4.8
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, Due to rounding, totals may not equal 100.0											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - ALABAMA											2015-16
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Alabama Non-MSA	56	6,611	10.1	2,368	79.1	35.7	46.3	5.5	58.9	15.4	5.4
Birmingham AL MSA	231	46,541	41.6	18,175	79.9	49.4	45.8	7.4	46.8	12.7	3.9
Decatur AL MSA	10	1,528	1.9	1,676	78.5	50.0	49.5	6.6	50.0	15.0	0.0
Gadsden AL MSA	16	2,713	2.9	1,020	79.7	56.3	41.4	5.9	43.8	14.5	0.0
Huntsville AL MSA	73	11,784	13.9	7,087	80.6	67.1	45.2	6.3	26.0	13.0	13.5
Montgomery AL MSA	36	7,382	6.5	4,242	76.1	52.8	45.1	7.5	38.9	16.5	17.6
Tuscaloosa AL MSA	133	23,275	24.0	2,886	81.4	42.9	45.4	6.2	49.6	12.4	7.5
Total	555	99,834	100.0	37,454	79.5	49.2	45.6	6.9	45.4	13.6	5.4
Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, Due to rounding, totals may not equal 100.0											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - FLORIDA **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Homosassa Springs FL MSA	30	3,596	9.6	4,398	0.0	0.0	0.0	20.1	23.3	18.1	62.7	56.7	60.9	17.3	20.0	21.0	0.0	0.0	0.0
North Port Sarasota FL MSA	109	28,666	35.0	29,217	1.0	1.8	0.6	18.3	31.2	13.4	50.7	39.5	47.7	29.9	27.5	38.3	0.0	0.0	0.0
Ocala FL MSA	29	3,477	9.3	9,919	0.6	0.0	0.2	14.5	13.8	11.0	69.6	69.0	71.5	15.3	17.2	17.3	0.0	0.0	0.0
Tampa FL MSA	143	37,428	46.0	106,705	1.9	2.1	1.5	21.9	35.0	17.5	39.7	33.6	39.0	36.5	29.4	41.9	0.1	0.0	0.1
Total	311	73,166	100.0	150,239	1.5	1.6	1.2	20.4	30.5	16.3	45.6	41.2	43.5	32.4	26.7	39.0	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - FLORIDA **2015-16**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Homosassa Springs FL MSA	56	5,500	20.6	4,164	0.0	0.0	0.0	8.1	10.7	7.4	75.5	76.8	70.6	16.4	12.5	22.1	0.0	0.0	0.0
North Port - Sarasota FL MSA	71	25,677	26.1	30,116	1.3	1.4	0.4	20.1	4.2	12.2	49.0	50.7	50.6	29.7	43.7	36.8	0.0	0.0	0.0
Ocala FL MSA	23	2,458	8.5	9,526	0.0	0.0	0.0	13.0	0.0	9.4	73.1	100.0	75.4	13.9	0.0	15.2	0.0	0.0	0.0
Tampa FL MSA	122	35,689	44.9	102,154	1.8	2.5	1.3	22.2	16.4	15.3	43.8	36.9	42.9	32.2	44.3	40.5	0.0	0.0	0.0
Total	272	69,324	100.0	145,960	1.4	1.5	1.0	20.4	10.7	14.1	48.8	54.0	47.4	29.4	33.8	37.6	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - FLORIDA **2017-18**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Homosassa Springs FL MSA	30	3,596	12.6	4,398	18.2	6.7	4.2	19.4	36.7	12.7	22.5	16.7	21.1	39.9	40.0	45.7	0.0	0.0	16.3
North Port Sarasota FL MSA	109	28,666	151.4	29,217	19.4	14.7	4.6	19.1	33.9	15.9	21.0	18.3	20.9	40.5	32.1	47.4	0.0	0.9	11.2
Ocala FL MSA	29	3,477	12.1	9,919	19.3	10.3	5.4	19.5	34.5	17.4	21.6	27.6	22.0	39.7	27.6	36.5	0.0	0.0	18.7
Tampa FL MSA	143	37,428	198.6	106,705	21.6	15.4	4.1	17.9	12.6	14.3	19.1	21.0	20.7	41.4	49.7	42.8	0.0	1.4	18.1
Total	311	73,166	431.9	150,239	20.8	13.8	4.3	18.3	24.4	14.8	19.8	20.3	20.8	41.0	40.5	43.4	0.0	1.0	16.8

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - FLORIDA **2015-16**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Homosassa Springs FL MSA	56	5,500	20.6	4,164	17.5	16.1	7.4	20.5	25.0	18.5	21.4	35.7	21.2	40.6	23.2	36.5	0.0	0.0	16.5
North Port - Sarasota FL MSA	71	25,677	26.1	30,116	19.6	8.5	3.7	19.0	14.1	14.1	20.9	14.1	20.4	40.5	52.1	49.8	0.0	11.3	12.0
Ocala FL MSA	23	2,458	16.0	9,526	18.1	4.3	4.0	19.8	39.1	14.5	22.8	13.0	21.6	39.3	39.1	40.6	0.0	4.3	19.3
Tampa FL MSA	122	35,689	44.9	102,154	20.7	10.7	4.1	18.5	16.4	14.2	19.7	16.4	19.7	41.0	54.1	43.5	0.0	2.5	18.5
Total	272	69,324	100.0	145,960	20.1	10.7	4.1	18.8	19.5	14.3	20.3	19.5	20.0	40.7	46.0	44.4	0.0	4.4	17.2

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - FLORIDA **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Homosassa Springs FL MSA	40	1,643	21.2	2,818	0.0	0.0	0.0	16.0	12.5	14.7	63.5	80.0	65.4	20.5	7.5	20.0	0.0	0.0	0.0
North Port Sarasota FL MSA	173	36,729	41.9	21,744	1.3	3.5	1.3	19.3	26.0	18.0	45.4	35.8	43.7	34.0	34.7	37.1	0.0	0.0	0.0
Ocala FL MSA	14	556	3.4	6,279	1.9	0.0	1.9	16.5	0.0	16.9	64.4	100.0	63.2	17.2	0.0	18.0	0.0	0.0	0.0
Tampa FL MSA	186	28,506	45.0	74,337	4.0	7.0	4.6	20.8	32.3	20.6	35.3	34.4	34.9	39.7	26.3	39.7	0.3	0.0	0.3
Total	413	67,434	100.0	105,178	3.2	4.6	3.6	20.1	26.6	19.6	40.0	41.6	39.2	36.5	27.1	37.4	0.2	0.0	0.2

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - FLORIDA **2015-16**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Homosassa Springs FL MSA	10	1,041	5.3	2,835	0.0	0.0	0.0	8.9	0.0	9.9	75.1	80.0	72.6	16.0	20.0	17.5	0.0	0.0	0.0
North Port - Sarasota FL MSA	171	37,157	46.2	22,839	1.5	1.8	1.3	20.5	28.7	18.7	42.5	28.1	40.1	35.5	41.5	39.8	0.0	0.0	0.0
Ocala FL MSA	8	2,004	2.2	5,942	0.0	0.0	0.0	18.2	0.0	18.1	54.1	100.0	52.8	27.7	0.0	29.1	0.0	0.0	0.0
Tampa FL MSA	181	35,088	48.9	74,386	2.8	7.7	3.3	21.3	33.7	20.7	38.6	42.5	38.4	37.1	16.0	37.6	0.1	0.0	0.1
Total	370	75,290	100.0	106,002	2.3	4.6	2.6	20.6	29.7	19.8	41.4	38.1	40.5	35.6	27.6	37.1	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - FLORIDA											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Homosassa Springs FL MSA	40	1,643	9.7	2,818	90.3	92.5	58.2	2.9	15.0	6.9	0.0
North Port - Sarasota FL MSA	173	36,729	41.9	21,744	90.2	59.5	53.0	3.7	31.8	6.1	8.7
Ocala FL MSA	14	556	3.4	6,279	88.9	100.0	50.8	3.7	0.0	7.4	0.0
Tampa FL MSA	186	28,506	45.0	74,337	89.3	61.3	52.2	3.9	34.9	6.8	3.8
Total	413	67,434	100.0	105,178	89.5	64.9	52.5	3.8	29.8	6.7	5.3
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, Due to rounding, totals may not equal 100.0											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - FLORIDA											2015-16
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Homosassa Springs FL MSA	10	1,041	3.7	2,835	90.3	80.0	53.9	2.9	28.6	6.8	0.0
North Port -Sarasota FL MSA	171	37,157	46.6	22,839	90.4	61.4	49.1	3.5	38.0	6.1	1.1
Ocala FL MSA	8	2,004	2.2	5,942	88.8	37.5	49.9	3.7	50.0	7.5	25.0
Tampa FL MSA	181	35,088	48.9	74,386	89.3	37.0	48.6	3.8	59.1	6.9	3.9
Total	370	75,290	100.0	106,002	89.5	49.5	49.0	3.7	48.1	6.8	2.4
Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, Due to rounding, totals may not equal 100.0											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - MISSISSIPPI **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Mississippi Non-MSA	391	62,422	100.0	3,334	1.4	1.8	1.4	8.6	6.4	6.1	57.2	50.1	53.6	32.8	41.7	38.8	0.0	0.0	0.0
Total	391	62,422	100.0	3,334	1.4	1.8	1.4	8.6	6.4	6.1	57.2	50.1	53.6	32.8	41.7	38.8	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - MISSISSIPPI **2015-16**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Mississippi Non-MSA	444	63,340	100.0	3,480	1.3	0.0	0.5	13.0	5.9	8.8	48.4	47.1	43.6	37.3	47.1	47.2	0.0	0.0	0.0
Total	444	63,340	100.0	3,480	1.3	0.0	0.5	13.0	5.9	8.8	48.4	47.1	43.6	37.3	47.1	47.2	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - MISSISSIPPI **2017-18**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Mississippi Non-MSA	391	62,422	214.8	3,334	22.5	2.6	3.3	14.8	13.0	10.3	17.1	16.9	17.7	45.6	65.7	51.3	0.0	1.8	17.5
Total	391	62,422	214.8	3,334	22.5	2.6	3.3	14.8	13.0	10.3	17.1	16.9	17.7	45.6	65.7	51.3	0.0	1.8	17.5

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - MISSISSIPPI **2015-16**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Mississippi Non-MSA	444	63,340	100.0	3,480	21.9	6.1	3.8	15.4	9.0	8.8	17.1	18.5	17.3	45.7	63.7	51.9	0.0	2.7	18.2
Total	444	63,340	100.0	3,480	21.9	6.1	3.8	15.4	9.0	8.8	17.1	18.5	17.3	45.7	63.7	51.9	0.0	2.7	18.2

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - MISSISSIPPI																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Mississippi Non-MSA	203	17,774	100.0	2,248	3.4	2.0	2.3	12.3	11.3	9.3	56.9	50.2	56.8	27.4	36.5	31.6	0.0	0.0	0.0
Total	203	17,774	100.0	2,248	3.4	2.0	2.3	12.3	11.3	9.3	56.9	50.2	56.8	27.4	36.5	31.6	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - MISSISSIPPI																			2015-16
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Mississippi Non-MSA	239	23,921	206.0	2,424	1.8	0.4	1.8	22.1	15.5	17.5	43.6	49.4	42.7	32.5	34.7	38.1	0.0	0.0	0.0
Total	239	23,921	206.0	2,424	1.8	0.4	1.8	22.1	15.5	17.5	43.6	49.4	42.7	32.5	34.7	38.1	0.0	0.0	0.0
Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - MISSISSIPPI											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Mississippi Non-MSA	203	17,774	100.0	2,248	78.8	59.6	52.9	5.5	30.5	15.7	9.9
Total	203	17,774	100.0	2,248	78.8	59.6	52.9	5.5	30.5	15.7	9.9
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, Due to rounding, totals may not equal 100.0											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - MISSISSIPPI											2015-16
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Mississippi Non-MSA	239	23,921	100.0	2,424	78.8	64.9	53.9	5.1	32.6	16.1	5.2
Total	239	23,921	100.0	2,424	78.8	64.9	53.9	5.1	32.6	16.1	5.2
Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, Due to rounding, totals may not equal 100.0											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - TENNESSEE																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Memphis TN MSA	50	6,646	100.0	22,875	13.8	16.0	4.9	18.8	6.0	11.8	15.9	16.0	14.5	51.4	62.0	68.9	0.2	0.0	0.0
Total	50	6,646	100.0	22,875	13.8	16.0	4.9	18.8	6.0	11.8	15.9	16.0	14.5	51.4	62.0	68.9	0.2	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - TENNESSEE **2015-16**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Memphis TN MSA	7	1,615	100.0	24,681	10.3	0.0	2.7	19.2	0.0	7.9	22.8	14.3	19.2	47.7	85.7	70.2	0.0	0.0	0.0
Total	7	1,615	100.0	24,681	10.3	0.0	2.7	19.2	0.0	7.9	22.8	14.3	19.2	47.7	85.7	70.2	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - TENNESSEE **2017-18**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Memphis TN MSA	50	6,646	106.4	22,875	26.3	28.0	3.4	15.3	30.0	10.6	16.2	8.0	16.3	42.2	34.0	45.4	0.0	0.0	24.3
Total	50	6,646	106.4	22,875	26.3	28.0	3.4	15.3	30.0	10.6	16.2	8.0	16.3	42.2	34.0	45.4	0.0	0.0	24.3

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - TENNESSEE **2015-16**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Memphis TN MSA	7	1,615	233.3	24,681	25.2	0.0	3.1	16.1	0.0	10.4	16.5	14.3	15.4	42.2	85.7	43.0	0.0	0.0	28.1
Total	7	1,615	233.3	24,681	25.2	0.0	3.1	16.1	0.0	10.4	16.5	14.3	15.4	42.2	85.7	43.0	0.0	0.0	28.1

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - TENNESSEE **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Memphis TN MSA	57	3,019	100.0	13,346	15.0	28.1	11.9	17.8	19.3	17.7	16.4	15.8	14.5	49.5	36.8	54.4	1.3	0.0	1.6
Total	57	3,019	100.0	13,346	15.0	28.1	11.9	17.8	19.3	17.7	16.4	15.8	14.5	49.5	36.8	54.4	1.3	0.0	1.6

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - TENNESSEE																			2015-16
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Memphis TN MSA	61	12,804	148.8	14,837	11.0	6.6	8.1	19.6	23.0	16.5	21.5	19.7	18.2	46.9	49.2	56.4	1.0	1.6	0.9
Total	61	12,804	148.8	14,837	11.0	6.6	8.1	19.6	23.0	16.5	21.5	19.7	18.2	46.9	49.2	56.4	1.0	1.6	0.9
Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - TENNESSEE											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Memphis TN MSA	57	3,019	100.0	13,346	79.4	73.7	46.9	7.4	26.3	13.2	0.0
Total	57	3,019	100.0	13,346	79.4	73.7	46.9	7.4	26.3	13.2	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, Due to rounding, totals may not equal 100.0											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - TENNESSEE											2015-16
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Memphis TN MSA	61	12,804	100.0	14,837	79.2	72.1	43.2	7.5	27.9	13.3	0.0
Total	61	12,804	100.0	14,837	79.2	72.1	43.2	7.5	27.9	13.3	0.0
Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, Due to rounding, totals may not equal 100.0											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - TEXAS **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Houston TX MSA	2,375	679,310	91.0	144,793	5.8	8.8	2.7	22.1	28.0	13.9	27.5	18.1	28.0	44.6	45.1	55.3	0.1	0.0	0.1
San Antonio TX MSA	235	48,600	9.0	55,279	5.3	5.5	1.4	27.8	37.0	15.6	27.5	14.9	32.1	39.4	42.6	50.8	0.0	0.0	0.0
Total	2,610	727,910	100.0	200,072	5.7	8.5	2.4	23.5	28.9	14.4	27.5	17.8	29.1	43.4	44.9	54.1	0.1	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - TEXAS **2015-16**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Houston TX MSA	1,247	441,722	91.6	161,271	4.4	2.7	1.8	21.6	10.8	10.8	29.0	13.3	29.2	45.0	73.1	58.2	0.0	0.0	0.0
San Antonio MSA	114	25,131	8.4	58,742	5.3	0.0	1.8	26.6	1.8	12.6	32.3	12.3	34.1	35.8	86.0	51.5	0.0	0.0	0.0
Total	1,361	466,853	100.0	220,013	4.6	2.5	1.8	22.9	10.1	11.3	29.8	13.2	30.5	42.6	74.2	56.4	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - TEXAS 2017-18																			
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Houston TX MSA	2,375	679,310	91.0	144,793	25.1	8.7	3.6	16.2	29.3	12.6	16.9	11.0	19.0	41.9	48.4	46.3	0.0	2.6	18.5
San Antonio TX MSA	235	48,600	36.5	55,279	24.1	5.5	3.5	17.7	28.9	11.8	19.3	14.9	21.2	39.0	50.2	40.7	0.0	0.4	22.7
Total	2,610	727,910	100.0	200,072	24.8	8.4	3.6	16.5	29.3	12.4	17.5	11.4	19.6	41.2	48.5	44.8	0.0	2.4	19.7
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - TEXAS																			2015-16
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Houston TX MSA	1,247	441,722	91.6	161,271	24.3	0.5	2.5	16.6	1.7	11.0	17.4	4.2	17.3	41.7	82.0	50.5	0.0	11.6	18.7
San Antonio TX MSA	114	25,131	16.4	58,742	24.0	0.0	3.1	17.3	0.0	9.9	19.2	0.9	19.4	39.4	99.1	41.6	0.0	0.0	25.9
Total	1,361	466,853	100.0	220,013	24.2	0.4	2.7	16.8	1.5	10.7	17.8	3.9	17.9	41.1	83.5	48.1	0.0	10.7	20.6
Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - TEXAS **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Houston TX MSA	420	91,520	97.4	134,566	10.6	11.0	10.7	19.3	14.0	19.2	22.3	16.4	22.8	47.6	58.6	47.1	0.2	0.0	0.2
San Antonio TX MSA	11	6,558	4.9	29,209	5.2	9.1	4.7	24.2	36.4	23.6	28.2	0.0	27.1	42.1	54.5	44.3	0.3	0.0	0.3
Total	431	98,078	100.0	163,775	9.5	10.9	9.7	20.3	14.6	20.0	23.5	16.0	23.6	46.5	58.5	46.6	0.2	0.0	0.2

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - TEXAS **2015-16**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Houston TX MSA	365	115,978	95.6	140,606	8.5	9.6	8.0	19.4	13.2	18.3	24.4	18.6	24.5	47.7	58.6	49.2	0.1	0.0	0.0
San Antonio TX MSA	17	8,882	8.8	31,723	5.7	35.3	5.9	23.5	41.2	21.7	29.6	5.9	26.8	41.0	17.6	45.4	0.3	0.0	0.3
Total	382	124,860	100.0	172,329	7.9	10.7	7.6	20.3	14.4	18.9	25.5	18.1	24.9	46.3	56.8	48.5	0.1	0.0	0.1

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues -TEXAS											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Houston TX MSA	420	91,520	97.4	134,566	85.4	49.3	45.7	6.0	43.6	8.7	7.1
San Antonio TX MSA	11	6,558	3.1	29,209	84.2	45.5	46.0	5.0	45.5	10.8	14.3
Total	431	98,078	100.0	163,775	85.1	49.2	45.7	5.8	43.6	9.1	7.2
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, Due to rounding, totals may not equal 100.0											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - TEXAS											2015-16
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Houston TX MSA	365	115,978	95.6	140,606	85.3	35.9	40.6	6.0	59.7	8.8	4.4
San Antonio MSA	17	8,882	4.7	31,723	83.9	35.3	40.4	5.2	64.7	10.9	0.0
Total	382	124,860	100.0	172,329	85.0	35.9	40.6	5.8	59.9	9.2	4.2
Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, Due to rounding, totals may not equal 100.0											